

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARK VEASEY, JANE ) CIVIL ACTION  
HAMILTON, SERGIO DELEON, )  
FLOYD J. CARRIER, ANNA ) NO. 2:13-CV-193 (NGR)  
BURNS, MICHAEL MONTEZ, ) [Lead case]  
PENNY POPE, OSCAR ORTIZ, KOBY )  
OZIAS, JOHN MELLOR-CRUMLEY, )  
PEGGY HERMAN, EVELYN )  
BRICKNER, GORDON BENJAMIN, )  
KEN GANDY, LEAGUE OF UNITED )  
LATIN AMERICAN CITIZENS )  
(LULAC), AND DALLAS COUNTY, )  
TEXAS, )  
 )  
Plaintiffs, )  
 )  
V. )  
 )  
RICK PERRY, GOVERNOR OF TEXAS )  
AND JOHN STEEN, TEXAS )  
SECRETARY OF STATE, )  
 )  
Defendants. )

1 UNITED STATES OF AMERICA, )  
2 Plaintiffs, ) CIVIL ACTION  
3 ) NO. 2:13-CV-263 (NGR)  
3 TEXAS LEAGUE OF YOUNG VOTERS ) [Consolidated case]  
EDUCATION FUND, IMANI CLARK, )  
4 AND MICHELLE BESSIAKE, )  
5 Plaintiff-Intervenors, )  
6 TEXAS ASSOCIATION OF HISPANIC )  
COUNTY JUDGES AND COUNTY )  
7 COMMISSIONERS, HIDALGO )  
COUNTY, AND MARIA LONGORIA )  
8 BENAVIDES, )  
9 Plaintiff-Intervenors, )  
10 V. )  
11 STATE OF TEXAS, JOHN STEEN, )  
in his official capacity as )  
12 Texas Secretary of State; and )  
STEVE McCRAW, in his official )  
13 capacity as Director of the )  
Texas Department of Public )  
14 Safety, )  
15 Defendants. )  
16  
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1 \*\*\*\*\*  
2 ORAL REALTIME DEPOSITION OF  
3 THE MALC 30(B)(6) WITNESS  
4 MARTIN GOLANDO  
5 JUNE 24, 2014  
6 \*\*\*\*\*  
7 ORAL REALTIME DEPOSITION OF MARTIN GOLANDO,  
8 produced as a witness at the instance of the DEFENDANTS,  
9 and duly sworn, was taken in the above-styled and  
10 numbered cause on the 24th day of June, 2014, from  
11 9:34 a.m. to 2:09 p.m., before STEVEN STOGEL, CSR in and  
12 for the State of Texas, reported by machine shorthand,  
13 at the Offices of the Texas Attorney General, 209 West  
14 14th Street, Austin, Texas, pursuant to the Federal  
15 Rules of Civil Procedure and the provisions stated on  
16 the record or attached hereto.  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 TEXAS STATE CONFERENCE OF )  
NAACP BRANCHES; and the ) CIVIL ACTION  
2 MEXICAN AMERICAN LEGISLATIVE )  
CAUCUS OF THE TEXAS HOUSE OF ) NO. 2:13-CV-291 (NGR)  
3 REPRESENTATIVES, ) [Consolidated case]  
4 Plaintiffs, )  
5 V. )  
6 JOHN STEEN, in his official )  
capacity as Secretary of )  
7 State of Texas; and STEVE )  
McCRAW, in his official )  
8 capacity as Director of the )  
Texas Department of Public )  
9 Safety, )  
10 Defendants. )  
11 BELINDA ORTIZ, LENARD TAYLOR, ) CIVIL ACTION  
EULALIO MENDEZ JR., LIONEL )  
12 ESTRADA; ESTELA GARCIA ) NO. 2:13-CV-348 (NGR)  
ESPINOSA, LYDIA LARA, ) [Consolidated case]  
13 MARGARITO MARTINEZ LARA, )  
MAXIMINA MARTINEZ LARA, AND )  
14 LA UNION DEL PUEBLO ENTERO, )  
INC., )  
15 Plaintiffs, )  
16 V. )  
17 STATE OF TEXAS; JOHN STEEN, )  
in his official capacity as )  
Texas Secretary of State; and )  
19 STEVE McCRAW, in his official )  
capacity as Director of the )  
20 Texas Department of Public )  
Safety, )  
21 Defendants. )  
22  
23  
24  
25

1 A P P E A R A N C E S  
2 FOR THE PLAINTIFF TEXAS STATE CONFERENCE OF NAACP  
BRANCHES:  
3 MS. AMY L. RUDD  
4 DECHERT LLP  
US Bank Tower  
5 633 West 5th Street, 37th Floor  
Los Angeles, California 90071-2013  
6 213.808.5700  
amy.rudd@dechert.com  
7  
8 FOR THE PLAINTIFF UNITED STATES OF AMERICA:  
9 MS. ANGELA J. MILLER  
(Appearing via speaker phone)  
10 Trial Attorney  
Voting Section  
11 Civil Rights Division  
U.S. Department of Justice  
12 202.514.2919  
angela.miller5@usdoj.gov  
13  
14 FOR THE DEFENDANTS THE STATE OF TEXAS, RICK PERRY, JOHN  
STEEN AND STEVEN McCRAW:  
15 MR. STEPHEN L. TATUM, JR.  
16 - and -  
MR. G. DAVID WHITLEY  
17 Assistant Attorney General  
Opinion Committee  
18 P.O. Box 12548  
Austin, Texas 78711-2548  
19 512.463.2110  
stephen.tatum@texasattorneygeneral.gov  
20 david.whitley@texasattorneygeneral.gov  
21  
ALSO PRESENT:  
22 Mr. Steven Stogel, Court Reporter  
23  
24  
25

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6	8
	1 MR. TATUM: Good morning. My name is
	2 Stephen Tatum. I'm an Assistant Attorney General
	3 representing the State of Texas in this litigation. It
	4 is June 24th. The time is 9:30, and we are here at the
	5 Price Daniel building, the Attorney General's offices in
	6 Austin, Texas.
	7 MARTIN A. GOLANDO,
	8 having been first duly sworn, testified as follows:
	9 EXAMINATION
	10 BY MR. TATUM:
	11 Q. Would you state and spell your full name for
	12 the record, please?
	13 A. Martin Anthony Golando, M-A-R-T-I-N, Anthony,
	14 A-N-T-H-O-N-Y, Golando, G-O-L-A-N-D-O.
	15 Q. Mr. Golando, where do you reside?
	16 A. San Antonio, Texas.
	17 Q. Are you represented by counsel today?
	18 A. I am.
	19 Q. And who is that?
	20 A. Ms. Rudd.
	21 MR. TATUM: And while we're there, let's
	22 go ahead and make introductions. I don't think we've
	23 done that on the record yet. I've said who I am.
	24 Mr. Golando, you've introduced yourself.
	25 MS. RUDD: Amy Rudd for the Texas State

7	9
	1 Conference of the NAACP and MALC and the witness today.
	2 MS. MILLER: And I'm Angela Miller for
	3 the U.S. Department of Justice on the phone.
	4 MR. WHITLEY: And I'm David Whitley for
	5 the defendants. I can give you a card.
	6 Q. (By Mr. Tatum) Mr. Golando, have you ever
	7 been deposed before?
	8 A. No, sir.
	9 Q. So this is your first time being the subject
	10 of a deposition?
	11 A. Being the subject, that's correct.
	12 Q. Okay. Let me first go over some ground rules
	13 that will control for this deposition. I'm going to be
	14 asking you questions, and I need you to give me audible
	15 answers. This means you need to say "yes" instead of
	16 nodding your head, and you need to say "no" instead of
	17 shaking your head. And try to avoid saying "uh-huh" or
	18 "hmm hmm," things like that. We need to have audible
	19 answers so the court reporter can get a clean record of
	20 what's said here today. Do you understand?
	21 A. I do.
	22 Q. And on that note, I ask that you please wait
	23 until I finish asking my question before you begin to
	24 answer, and I'll try to do the same for you. This is
	25 easier said than done. I just ask that we try to let

1 each other talk, again so that we get a clean record of 2 what's said here today. Do you understand? 3 A. Yes, sir. 4 Q. Okay. If you don't understand a question that 5 I ask or you need me to repeat it or clarify it in any 6 way, please say so. I'm happy to do so. Anything I can 7 do to make you understand what I'm asking you. Do you 8 understand? 9 A. Yes, sir. 10 Q. Okay. There may be times when your attorney 11 may object to a question that I ask, in which case 12 you're still required to answer the question unless your 13 attorney specifically instructs you not to. Do you 14 understand? 15 A. Yes. 16 Q. Do you understand that you are under oath, 17 which means you must tell the truth, and you're subject 18 to the penalty of perjury if you do not? 19 A. Yes. 20 Q. Mr. Golando, how are you feeling today? 21 A. I'm fine. Thank you for asking. 22 Q. Are you suffering from any illnesses that 23 would prevent you from answering my questions truthfully 24 and accurately? 25 A. No, sir.	10 1 person, yeah. 2 Q. Okay. Was anyone else present at that 3 meeting? 4 A. No, sir. 5 Q. So it was just you and the two lawyers? 6 A. Correct. 7 Q. Okay. Did you review any documents in 8 preparation for this deposition? 9 A. Yes. I read the complaint again, and I read a 10 Brennan Center exhibit that I think was attached to the 11 complaint, and I read Mr. Yannis Banks' deposition -- or 12 most of it. I didn't read the entire thing. I read 13 about three-quarters of it. 14 Q. How much time did you spend reviewing those 15 documents? 16 A. I got home last night about 8:30, and I spent 17 the balance of the evening until about 11:00 reviewing 18 those documents. 19 Q. So more or less three hours reviewing those 20 documents? 21 A. Oh, it would have been about midnight. So 22 about three and a half -- or two and a half, I guess, 23 whatever that is. 24 Q. Did you bring any documents with you today? 25 A. No, sir, I did not.
11 1 Q. Are you taking any medications today that 2 might prevent you from answering my questions truthfully 3 and accurately? 4 A. No, sir. 5 Q. Is there anything else that might prevent you 6 from answering my questions truthfully and accurately? 7 A. No, sir. 8 Q. What did you do to prepare for this deposition 9 today? 10 A. I met with counsel, and I reviewed some 11 documents. 12 Q. When you say "counsel," is that Ms. Rudd? 13 A. That's correct, and Ms. Cohan, I guess is her 14 name. She used to be Ms. Stelcen, but now she's 15 Ms. Cohan. 16 Q. Is that Lindsey Cohan? 17 A. That's correct. 18 Q. And when did you meet with them? 19 A. Yesterday about 2:30, I believe. 20 Q. And for how long did y'all meet? 21 A. It was about an hour and ten minutes, I 22 believe. 23 Q. Was that the only time y'all met in 24 preparation for this deposition? 25 A. I think that's right. That's right. Met in	11 13 1 Q. Is there anything else you did to prepare for 2 this deposition that you did not already mention? 3 A. I dreamt about the deposition a couple of 4 times. I'm not sure you can count that. But, yeah, I 5 guess that's preparation. Other than that, I can't 6 think of anything right offhand. 7 Q. All right. Mr. Golando, I want to ask you a 8 few questions regarding your background. 9 A. Okay. 10 Q. Can you state the date and place of your 11 birth? 12 A. I was born November 11th, 1977, and I was born 13 in Kirksville, Missouri, in Adair County, Missouri. 14 Q. Can you describe your educational background? 15 A. I went to Chesterton High School in 16 Chesterton, Indiana, class of '96, and I briefly went to 17 the University of Chicago before I was kicked out. I 18 toolled around Chicago a bit, and then I ended up at 19 UTSA. Graduated at UTSA in 2003, and then I went to UT 20 Law and graduated in 2007. 21 Q. So you were born in Tennessee, went -- 22 A. No, no. Missouri. 23 Q. I'm sorry. 24 A. I apologize. I didn't mean to interrupt you. 25 I apologize.

1 Q. You were born in Missouri?  
 2 A. Correct.  
 3 Q. Had some schooling in Indiana, made your way  
 4 to Chicago, and eventually Texas. Is that correct?  
 5 A. There's lots of -- there's many more states in  
 6 between there, but, yes, that's generally correct.  
 7 Q. Okay.  
 8 A. Yeah.  
 9 Q. And what year did you graduate from law  
 10 school?  
 11 A. 2007.  
 12 Q. Aside from a law degree, do you have any other  
 13 professional qualifications?  
 14 A. By which you mean certifications?  
 15 Q. Sure.  
 16 A. No.  
 17 Q. Are you currently licensed to practice law?  
 18 A. Currently, and in good standing.  
 19 Q. In the state of Texas?  
 20 A. Correct.  
 21 Q. In what areas of practice do you have  
 22 experience?  
 23 A. I'm an election law attorney, largely. I've  
 24 done several election contests, and I represent elected  
 25 officials in helping them comply with their ethical

1 A. Since May 1st.  
 2 Q. Of this year?  
 3 A. Correct.  
 4 Q. Did you have any role at MALC before you  
 5 became general counsel?  
 6 A. Yes. It was basically the same job without  
 7 the title. I weighed in on the legal consequences of  
 8 actions. I weighed in on the day-to-day operations. I  
 9 worked very closely with the executive director. It's  
 10 essentially the same job with the title, so...  
 11 Q. Is your current role as general counsel -- is  
 12 that a paid position?  
 13 A. Yes.  
 14 Q. Is that a full-time position?  
 15 A. By full time, do you mean do I get a W-2 from  
 16 MALC? I never have got a W-2 from MALC. I get a --  
 17 they 1099 me, or whatever. I'm a vendor, essentially.  
 18 Q. So prior to becoming general counsel, you were  
 19 employed in a general counsel-type role at MALC. It  
 20 just wasn't called general counsel. Correct?  
 21 A. Right. I think it's listed in the C&E as a  
 22 consulting, but it's -- I do the same general things I  
 23 did before.  
 24 Q. Okay. As general counsel, what are your  
 25 official duties and responsibilities?

1 compliance rules. I'm a voting rights attorney. I have  
 2 some background in voting rights. Anything I can get  
 3 paid for, frankly. So if you need something, let me  
 4 know.  
 5 Q. Mr. Golando, are you currently employed?  
 6 A. I'm self-employed.  
 7 Q. Does that mean you have a solo practice?  
 8 A. I do. I have a couple of different business  
 9 enterprises. One is a solo practice.  
 10 Q. Do you office here in Austin?  
 11 A. No, not currently. I will soon, hopefully,  
 12 but mostly in San Antonio.  
 13 Q. Mr. Golando, what is your role at MALC? And  
 14 before you answer that question, let me just go ahead  
 15 and say here, when I say "MALC," I mean the Mexican  
 16 American Legislative Caucus. And throughout this  
 17 deposition, I might say "MALC" or "you" or "your," and  
 18 when I say that, I mean MALC unless I specifically  
 19 indicate otherwise. Do you understand?  
 20 A. I do.  
 21 Q. Okay. So getting back to my question, what is  
 22 your role at MALC?  
 23 A. I am the general counsel of MALC. That's my  
 24 title.  
 25 Q. And how long have you held that position?

1 A. I make sure that we comply with all ethical  
 2 laws that caucuses have to do for reporting. I weigh in  
 3 on the legal consequences of certain actions we might  
 4 take. I'm a strategic and tactical thinker for MALC on  
 5 our policy positions. I do policy development. I weigh  
 6 in on employment practices and how to train employees,  
 7 and I do -- and I work very closely with the Executive  
 8 Director to try to make sure we accomplish our  
 9 objectives.  
 10 Q. And who is the Executive Director?  
 11 A. Summer Luciano.  
 12 Q. So would you say that you wear -- in a legal  
 13 capacity, you wear many different hats at MALC?  
 14 A. Surely. I think that's fair.  
 15 Q. Who do you report to?  
 16 A. The chairman, Martinez Fischer.  
 17 Q. Do you manage anyone?  
 18 A. I used to manage people as his chief of staff,  
 19 but I stopped being his chief of staff on May 1st, and  
 20 now I basically -- I don't think I'm directly managing  
 21 anybody currently, so...  
 22 Q. So you were formerly the chief of staff for  
 23 Representative Trey Martinez Fischer. Correct?  
 24 A. That is correct.  
 25 Q. And how long did you hold that position?

18

1 A. That position? I think I -- I got that  
 2 position in August or September of 2008. I think that's  
 3 correct. And so I held it until May 1st of this year.  
 4 So six years, five and a half years, five and  
 5 three-quarters, something like that.  
 6 Q. So you are no longer his chief of staff?  
 7 A. No, I'm not. It's strange, frankly, but --  
 8 Q. What were your official duties and  
 9 responsibilities as chief of staff for Representative  
 10 Martinez Fischer?  
 11 A. In short, I was responsible for everything  
 12 that the office did.  
 13 Q. Outside of a legal capacity, is there any  
 14 other -- do you have any other involvement -- let me  
 15 restate the question.  
 16 Do you have any other involvement with  
 17 MALC outside of a legal capacity?  
 18 A. I'm not sure I understand your question.  
 19 Could you give me an example of what you mean, and maybe  
 20 I can --  
 21 Q. Sure. Do you -- are you involved in any kind  
 22 of budgetary matters at MALC?  
 23 A. Sure.  
 24 Q. Are you involved in programming or activities  
 25 that MALC conducts?

20

1 Q. Did you review this document in preparation  
 2 for this deposition today?  
 3 A. Yes, I think I remember seeing it.  
 4 Q. Is it your understanding that you've been  
 5 designated by MALC to testify and give truthful and  
 6 binding answers on its behalf today?  
 7 A. Yes.  
 8 Q. Okay. Now, with that document, if you would,  
 9 please, turn to Page 5. Are you there?  
 10 A. Yes, sir.  
 11 Q. Okay. Under the heading at the bottom of the  
 12 page there titled "Matters," there is a series of  
 13 numbered paragraphs from 1 to 26. Do you see those  
 14 numbered paragraphs?  
 15 A. Yes, sir.  
 16 Q. Okay. Now, if we can, quickly I'd like to go  
 17 through some of these and ask you some very brief  
 18 questions about them.  
 19 Topic 1 says, "The factual basis of your  
 20 claims or defenses in this lawsuit, including any  
 21 contention that SB 14, as enacted by the State of Texas'  
 22 82nd Legislature, was (1) enacted with a discriminatory  
 23 purpose and intent, and (2) results in denying and  
 24 abridging the right to vote on account of race and  
 25 language minority status."

19

1 A. Surely.  
 2 Q. Are you involved in PR at MALC?  
 3 A. Yes, generally; although, it's certainly not  
 4 my strong suit. You wouldn't want me to do that for  
 5 you, trust me.  
 6 Q. Have you been providing legal representation  
 7 to MALC during this litigation?  
 8 A. Yes.  
 9 Q. And what has that legal representation  
 10 entailed generally?  
 11 A. Generally, advice on the scope of the law and  
 12 how it might impact MALC members and the MALC staff.  
 13 Q. Have you assisted with drafting pleadings or  
 14 motions?  
 15 A. No, not really. Not for this litigation.  
 16 (Exhibit No. 1 marked)  
 17 Q. (By Mr. Tatum) Mr. Golando, I'm handing you  
 18 what's been marked as Exhibit 1. If you would, please  
 19 take a minute to review this document. Are you  
 20 finished?  
 21 A. (Witness nods head).  
 22 Q. Having reviewed this document, Mr. Golando, do  
 23 you recognize what this document is?  
 24 A. Yes. This is the notice of deposition for the  
 25 MALC representative.

21

1 Have you been designated to testify to  
 2 Topic 1 today?  
 3 A. Yes.  
 4 Q. And have you prepared to testify on Topic 1?  
 5 A. Yes.  
 6 Q. Topic 2 says, "Any interest you have in the  
 7 above-captioned litigation that is not adequately  
 8 represented by the Plaintiff United States of America."  
 9 Have you been designated to testify to  
 10 Topic 2?  
 11 A. Yes.  
 12 Q. And have you prepared to testify to Topic 2?  
 13 A. Yes.  
 14 Q. Topic 3 says, "The identity of your members on  
 15 September 17th, 2013."  
 16 Have you been designated to testify to  
 17 Topic 3 today?  
 18 A. Yes.  
 19 Q. And are you prepared to testify to Topic 3?  
 20 A. Yes.  
 21 Q. Topic 4 says, "The identity of your members at  
 22 present."  
 23 Have you been designated to testify to  
 24 Topic 4?  
 25 A. Yes.

	<p>22</p> <p>1 Q. And are you prepared to testify to Topic 4?</p> <p>2 A. Yes.</p> <p>3 Q. Topic 5 says, "Your activities related to</p> <p>4 voter identification legislation proposed or enacted in</p> <p>5 Texas since 2004."</p> <p>6 Have you been designated to testify to</p> <p>7 Topic 5?</p> <p>8 A. Yes.</p> <p>9 Q. Are you prepared to testify to Topic 5?</p> <p>10 A. Yes.</p> <p>11 Q. Topic 6 says, "All bills and amendments</p> <p>12 drafted, researched, proposed or requested by you</p> <p>13 regarding SB 14."</p> <p>14 Let me just stop here and say: When I</p> <p>15 say "SB 14," I mean Senate Bill 14 that was enacted</p> <p>16 during the 2011 Legislature. Do you understand?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Have you been designated to testify to</p> <p>19 Topic 6?</p> <p>20 A. Yes.</p> <p>21 Q. Are you prepared to testify to Topic 6?</p> <p>22 A. Yes.</p> <p>23 Q. Topic 7 says, "All communications to or from</p> <p>24 constituents of your members in your possession,</p> <p>25 custody, or control regarding SB 14."</p>
	<p>23</p> <p>1 Have you been designated to testify to</p> <p>2 Topic 7?</p> <p>3 A. Yes.</p> <p>4 Q. And are you prepared to testify to Topic 7?</p> <p>5 A. Yes.</p> <p>6 Q. Topic 8 says, "Your activities relating to</p> <p>7 voter identification legislation proposed or enacted by</p> <p>8 any other United States state that is not Texas, any</p> <p>9 United States territory or outlying possession, or the</p> <p>10 District of Columbia since 2004."</p> <p>11 Have you been designated to testify to</p> <p>12 Topic 8?</p> <p>13 A. Yes.</p> <p>14 Q. Are you prepared to testify to Topic 8?</p> <p>15 A. To the best of my ability.</p> <p>16 MS. RUDD: This may be a good time for me</p> <p>17 to just interpose an objection. You know, we've lodged</p> <p>18 written objections to all of these topics and -- or many</p> <p>19 of these topics, and to the extent that we've objected</p> <p>20 on the grounds of relevance, we haven't gone out of our</p> <p>21 way to prepare Mr. Golando to testify on those topics.</p> <p>22 He does know something about Topic 8 and will testify to</p> <p>23 the best of his ability, as with all of the topics that</p> <p>24 we've lodged objections to.</p> <p>25 MR. TATUM: Okay. Thank you.</p> <p>24</p> <p>1 Q. (By Mr. Tatum) Mr. Golando, Topic 9 says,</p> <p>2 "Any policymaking or advocacy-related work performed by</p> <p>3 you or on your behalf regarding voter identification</p> <p>4 since 2004."</p> <p>5 Have you been designated to testify to</p> <p>6 Topic 9?</p> <p>7 A. Yes.</p> <p>8 Q. Are you prepared to testify to Topic 9?</p> <p>9 A. Yes.</p> <p>10 Q. Topic 10 says, "Your activities relating to</p> <p>11 voter registration since 2004."</p> <p>12 Have you been designated to testify to</p> <p>13 Topic 10?</p> <p>14 A. Yes.</p> <p>15 Q. Are you prepared to testify on Topic 10?</p> <p>16 A. Yes.</p> <p>17 Q. Topic 11 says, "Your activities relating to</p> <p>18 voter education since 2004."</p> <p>19 Have you been designated to testify to</p> <p>20 Topic 11?</p> <p>21 A. Yes.</p> <p>22 Q. Are you prepared to testify to Topic 11?</p> <p>23 A. Yes.</p> <p>24 Q. Topic 12 says, "Your activities relating to</p> <p>25 assisting voters during elections since 2004."</p> <p>25</p> <p>1 Have you been designated to testify to</p> <p>2 Topic 12?</p> <p>3 A. Yes.</p> <p>4 Q. Are you prepared to testify to Topic 12?</p> <p>5 A. Yes.</p> <p>6 Q. Topics 13 says, "Any activities by you or on</p> <p>7 your behalf regarding SB 14."</p> <p>8 Have you been designated to testify to</p> <p>9 Topic 13?</p> <p>10 A. Yes. And we agree that this is inclusive of</p> <p>11 everything you just said, I imagine. Right? Matter 13</p> <p>12 is inclusive of everything previous, every other matter</p> <p>13 before that. But, yes, I've been designated.</p> <p>14 Q. I'm just talking about the language in</p> <p>15 Topic 13.</p> <p>16 A. That's fair.</p> <p>17 Q. Okay. Are you prepared to testify regarding</p> <p>18 Topic 13?</p> <p>19 A. Certainly.</p> <p>20 Q. Topic 14 says, "All written testimony, talking</p> <p>21 points, or public statements made by you regarding</p> <p>22 SB 14."</p> <p>23 Have you been designated to testify to</p> <p>24 Topic 14?</p> <p>25 A. Yes, sir.</p>

<p>1 Q. And are you prepared to testify to Topic 14?  2 A. Yes.  3 Q. Topic 15 says, "Any calculations, reports,  4 audits, estimates, projections, or other analyses  5 related to the effect of SB 14 on minority voters or on  6 voters who are members of a language minority group from  7 2005 to the present."  8 Have you been designated to testify to  9 Topic 15?  10 A. Yes, sir.  11 Q. And are you prepared to testify to Topic 15?  12 A. Yes.  13 Q. Topic 16 says, "The identity of each  14 registered voter known to you on September 17th, 2013,  15 who you contend has been unable to vote on account of  16 his or her inability to obtain photographic  17 identification specified by SB 14 as enacted by the  18 State of Texas' 82nd Legislature."  19 Have you been designated to testify to  20 Topic 16?  21 A. Yes.  22 Q. Are you prepared to testify to Topic 16?  23 A. Yes.  24 Q. Only 10 more. Topic 17 says, "The identity of  25 each registered voter known to you at present, who you</p>	<p>26</p> <p>1 identification specified by SB 14 as enacted by the  2 State of Texas' 82nd Legislature to obtain such a form  3 of photographic identification."  4 Have you been designated to testify to  5 Topic 19?  6 A. Yes.  7 Q. Are you prepared to testify on Topic 19?  8 A. Yes.  9 MR. TATUM: With regard to Topic 20, I  10 believe y'all have objected to this topic on grounds  11 that -- stating that MALC does not maintain lists by  12 name or by number of its members who have participated  13 in elections and cannot produce a witness to testify to  14 this topic. Is that correct?  15 MS. RUDD: That is correct.  16 MR. TATUM: Okay.  17 MS. RUDD: So that is the only topic in  18 this list that we -- we are not prepared to offer  19 Mr. Golando up to testify about.  20 MR. TATUM: Okay.  21 Q. (By Mr. Tatum) Topic 21 states, "The  22 allegation in Paragraph 4(c) of your Federal Complaint  23 that SB 14 is causing and will continue to cause MALC to  24 divert a portion of its financial and other  25 organizational resources to educate Texas citizens about</p>
<p>27</p> <p>1 contend has been unable to vote on account of his or her  2 inability to obtain photographic identification  3 specified by SB 14 as enacted by the State of Texas'  4 82nd Legislature."  5 Have you been designated to testify to  6 Topic 17?  7 A. Yes.  8 Q. Are you prepared to testify to Topic 17?  9 A. Yes.  10 Q. Topic 18 says, "Attempts made from 2011 to the  11 present by each registered voter known to you on  12 September 17th, 2013, who you contend has been unable to  13 vote on account of his or her inability to obtain  14 photographic identification specified by SB 14 as  15 enacted by the State of Texas' 82nd Legislature to  16 obtain such a form of photographic identification."  17 Have you been designated to testify to  18 Topic 18?  19 A. Yes.  20 Q. Are you prepared to testify to Topic 18?  21 A. Yes.  22 Q. Topic 19 says, "Attempt made from 2011 to the  23 present by each registered voter known to you at the  24 present who you contend has been unable to vote on  25 account of his or her inability to obtain photographic</p>	<p>27</p> <p>29</p> <p>1 the photo ID requirements of SB 14, and assisting voters  2 in casting in-person ballots in compliance with SB 14."  3 Have you been designated to testify to  4 Topic 21?  5 A. Yes.  6 Q. Are you prepared to testify to Topic 21?  7 A. Yes.  8 Q. Topic 22 states, "The allegation in  9 Paragraph 4(c) of your Federal Complaint that MALC is  10 limited and will continue to be limited to devoting  11 fewer resources to its other organizational activities."  12 Have you been designated to testify to  13 Topic 22?  14 A. Yes.  15 Q. Are you prepared to testify to Topic 22?  16 A. Yes.  17 Q. Topic 23 states, "Any allegations, whether  18 substantiated or unsubstantiated, or concerns relating  19 to election crimes raised by your members or their  20 constituents or which were communicated to you from 2004  21 to the present."  22 A. Yes.  23 Q. Have you been designated to testify to  24 Topic 23?  25 A. I apologize. Yes.</p>

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1 Q. Are you prepared to testify to Topic 23?  
 2 A. Yes, sir.  
 3 Q. Last page. Topic 24 states, "Any allegations,  
 4 whether substantiated or unsubstantiated or concerns  
 5 relating to voter fraud raised by your members or their  
 6 constituents or which were communicated to you from 2004  
 7 to the present."

8 Have you been designated to testify to  
 9 Topic 24?

10 A. Yes.

11 Q. Are you prepared to testify to Topic 24?

12 A. Yes.

13 Q. Topic 25 states, "Any calculations, reports,  
 14 audits, estimates, projections, or other analyses done  
 15 by you, commissioned by you, or in your possession,  
 16 custody, or control relating to voter fraud from 2004 to  
 17 the present."

18 Have you been designated to testify to  
 19 Topic 25?

20 A. Yes.

21 Q. Are you prepared to testify to Topic 25?

22 A. Yes.

23 Q. Finally, Topic 26 states, "Any calculations,  
 24 reports, audits, estimates, projections, or other  
 25 analyses done by you, commissioned by you, or in your

1 beginning it was both the House and Senate, and at some  
 2 point there was a bifurcation between the two, so...  
 3 Q. Does MALC have -- as a result of that  
 4 bifurcation, does it have an equivalent organization in  
 5 the Senate?  
 6 A. Yeah. There's a Hispanic caucus. The chair,  
 7 I think, is Jose Rodriguez.

8 Q. Do y'all regularly work with the Senate  
 9 Hispanic caucus?

10 A. Define "regularly."  
 11 Q. Are y'all involved organizationally with the  
 12 Senate Hispanic caucus?  
 13 A. Yes. I know Luis very well. Luis Figueroa is  
 14 the liaison, I guess, for the Senate Hispanic caucus,  
 15 and I've worked with him for many years.

16 Q. But is MALC a separate entity unto itself from  
 17 the Senate Hispanic caucus?

18 A. Absolutely.

19 Q. Okay. How is MALC organized?

20 A. We are a (c)3 and a (c)6 and a legislative  
 21 caucus.

22 Q. Describe what it means to be a legislative  
 23 caucus.

24 A. It's organized under the House housekeeping  
 25 resolution. There's a portion dedicated to the creation

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1 possession, custody, or control, relating to election  
 2 crimes from 2004 to the present."

3 Have you been designated to testify to  
 4 Topic 26?

5 A. Yes.

6 Q. Are you prepared to testify to Topic 26?

7 A. Yes.

8 Q. Okay. Mr. Golando, I'd like to ask you a few  
 9 questions regarding MALC generally.

10 Q. Can you describe the purpose and mission  
 11 of MALC?

12 A. The purpose of MALC is to assist the members  
 13 of MALC and their staffs in being prepared to be a voice  
 14 for the Mexican Americans of Texas. That's the purpose.  
 15 It's also listed in their bylaws, so...

16 Q. So that's a stated mission that's in your  
 17 bylaws?

18 A. Correct.

19 Q. How long has MALC been in existence?

20 A. Since 1973. So 40 years -- 40-plus years.

21 Q. And how was it formed?

22 A. It was a caucus. There's rumors about how it  
 23 was formed, in the back of a closet, but just members  
 24 of -- Mexican American members of the Legislature at  
 25 that time formed together a group. And I think at the

1 of legislative caucuses, which are groups of legislators  
 2 for various purposes. So it's organized under that  
 3 statute. And legislative caucuses also have certain  
 4 reporting requirements under the -- the C&E reports for  
 5 the Ethics Commission. I think that covers it, so...

6 Q. How was MALC organized internally?

7 A. There is an executive committee made up of the  
 8 chair, the vice chair, the legal counsel, the treasurer,  
 9 and the secretary. So it's five legislators who run for  
 10 leadership posts within MALC, and they make most of the  
 11 executive decisions. By "internally," do you also mean  
 12 staff?

13 Q. Sure.

14 A. There's Executive Director Summer, and general  
 15 counsel, me, and then there are two policy analysts,  
 16 part time and full time, roughly.

17 Q. So everyone on the Executive Committee is also  
 18 a legislator?

19 A. Correct. MALC is made up of legislators.

20 It's a group of legislators.

21 Q. Do you work under the legal counsel?

22 A. No. I report to their chairman,  
 23 Representative Martinez Fischer.

24 Q. Okay. And is the Executive Committee elected  
 25 by the membership of MALC?

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1 A. Correct.  
2 Q. And how long do they serve on the Executive  
3 Committee?  
4 A. Roughly two years, and then there's elections  
5 either during the session or just before the session,  
6 right after the election, so...  
7 Q. And this is all in the bylaws, everything  
8 you've told me so far?  
9 A. Yes, sir, that's correct.  
10 Q. Do you know how many members MALC has?  
11 A. 41, I believe.  
12 Q. Does that stay the same over the years, or  
13 does that fluctuate?  
14 A. It fluctuates. In 2011, I think we had 39.  
15 In 2013, we had 40, I believe. And now we have 41  
16 because Celia Israel just won a special election, and  
17 she's decided to be a MALC member.  
18 Q. That leads me to my next question. You stated  
19 that she's decided to be a MALC member. How does one  
20 become a MALC member?  
21 A. There are two ways. I think if you're  
22 Mexican-American, you're entitled to automatic  
23 admittance if you accept and -- or if you're a Latino.  
24 But if you're not Latino but represent a majority Latino  
25 district, you can get in through a committee process.

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1 You get the normal provisions that come with being part  
2 of a legislator group, where you can work together to  
3 form coalitions with other groups to pass legislation.  
4 You get information.  
5 So MALC members will call MALC staff to  
6 help us -- help them research ideas. We do some measure  
7 of policy development, and we'll do anything we can for  
8 members to help pass their bills or help them with an  
9 initiative they have.  
10 In addition, we have space, and sometimes  
11 our space is used for events. There's other things that  
12 we can offer. We do basically everything we can for our  
13 members.  
14 Q. You mentioned that space. Where is that  
15 space?  
16 A. 202 West 13th Street, which is about a block  
17 away from here. And we have space 204, which is  
18 essentially a meeting space for caucus meetings or  
19 for -- if MALC members want to meet with their  
20 constituents there, it's our privilege to have them  
21 there, so...  
22 Q. If you're a member of MALC, are you authorized  
23 to speak on MALC's behalf?  
24 A. No.  
25 Q. Who is authorized to speak on MALC's behalf?

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1 It's all listed in the bylaws, so...  
2 Q. Are there fees or dues involved with being a  
3 member of MALC?  
4 A. There are.  
5 Q. Do you know how much those dues are?  
6 A. I think it's \$300 for a two-year cycle. I  
7 think that's right. It may be \$300 a year. I can't  
8 recall exactly. It's nominal.  
9 Q. Are there different levels of membership, or  
10 is it you're a member of MALC and that's what everyone  
11 is?  
12 A. I think you're a member of MALC and that's  
13 what everyone is.  
14 Q. Okay. Is MALC a partisan organization?  
15 A. No.  
16 Q. So the membership of MALC is comprised of both  
17 Republicans and Democrats. Is that --  
18 A. Correct.  
19 Q. -- correct?  
20 A. Correct. I'm sorry. I didn't mean to cut you  
21 off.  
22 Q. No problem. What kind of privileges or  
23 benefits come with being a member of MALC?  
24 A. I think you get to speak as a unified voice on  
25 matters of importance to the Mexican-American community.

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1 A. The chairman.  
2 Q. Only the chairman?  
3 A. I believe that's true in the bylaws, that he  
4 has a specific bylaw that says the chairman is  
5 authorized to make executive decisions and speak on  
6 MALC's behalf. In practice, though, it rarely ever  
7 comes up. There may be some certain designees by the  
8 chairman, "You can speak on this matter for us. You can  
9 speak on public education for us," but that's usually by  
10 designation.  
11 But I think as a matter of bylaw, I think  
12 only the chairman has the authority to speak on behalf  
13 of MALC.  
14 Q. So if someone seeks the official position of  
15 MALC, they will seek that from the chairman,  
16 Representative Martinez Fischer?  
17 A. That's right. Yes, sir.  
18 Q. You mentioned employees and staff of which  
19 you're a part. Do you know how many, roughly, employees  
20 or staff that MALC employees?  
21 A. It fluctuates. During the session, there's  
22 obviously more. And there's also the MALLF fellows  
23 program. So they're paid for by the MALLF foundation,  
24 but they are in the staff of certain representatives who  
25 request and want MALLF fellows. Currently we have four

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1 employees, and some -- I think we have two interns.  
2 Q. I'm sorry. You said MALC has four employees?  
3 A. Currently. And if you count me as an  
4 employee, and I think you should, even though I'm  
5 technically a vendor. It's kind of a strange  
6 difference, right, but --  
7 Q. So when you say you're a vendor, does that  
8 mean you kind of operate on a contract basis?  
9 A. That's correct, a month-to-month,  
10 nonrefundable retainer, thankfully, so...  
11 Q. You were just mentioning MALLF, I believe?  
12 A. Yes.  
13 Q. M-A-L-F?  
14 A. There's two Ls, I believe. Mexican American  
15 Legislative Leadership Foundation. That's the (c)3.  
16 Q. Okay. So that is a -- MALLF falls under the  
17 umbrella of MALC?  
18 A. Correct.  
19 Q. And what is the purpose of MALLF?  
20 A. To fund fellowships for college students and  
21 graduates to get a stipend to work in MALC member  
22 offices so they can learn about the Legislature.  
23 Q. Okay.  
24 A. It's the Moreno/Rangel program.  
25 Q. Aside from the benefits and privileges that

1 Lots of people give MALC money. Some individuals, some  
2 corporations, I believe, and some PACs do. Members give  
3 us money, too, through their dues, so...  
4 Q. So y'all receive funding through individual  
5 donations?  
6 A. Occasionally. It's rare, but yes.  
7 Q. Do y'all receive funding through corporate  
8 donations?  
9 A. I believe that's true. I'd have to check our  
10 C&E. I'm not sure to what degree we get corporate  
11 funding or not, but --  
12 Q. So the C&E reports, which you said are  
13 publicly available, they detail the sources and  
14 amounts of the funding that MALC receives?  
15 A. That is absolutely correct. I think we are  
16 one of the few legislative caucuses that detail every  
17 one of our contributions and expenditures.  
18 Q. Do y'all receive funding from sponsorships?  
19 A. What does that mean?  
20 Q. Do y'all hold any events that are sponsored by  
21 corporations or other entities?  
22 A. Truly.  
23 Q. What kind of events do y'all -- what kind of  
24 such events do y'all hold?  
25 A. Annually we have a MALC golf tournament, which

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1 come with being a member of MALC, which you just  
2 described, who does MALC serve other than its members?  
3 A. We serve our members and, by extrapolation,  
4 their constituents.  
5 Q. Does MALC maintain active communications with  
6 the constituents of its members?  
7 A. We get some contact from the constituents of  
8 members, some people at large will call us, contact us  
9 about voter ID issues or redistricting issues or other  
10 issues that we're at the forefront of. It happens  
11 occasionally, yes.  
12 Q. So when a constituent calls you, as you said,  
13 are they calling to communicate with MALC as an  
14 organization or to communicate with one of its  
15 individual members?  
16 A. The former, MALC as an organization, so...  
17 Q. Now, you stated that MALC is a nonprofit  
18 organization. Correct?  
19 A. That's correct.  
20 Q. From where does MALC receive funding?  
21 A. It's listed in our C&E reports. So lots of  
22 PACs give to us --  
23 Q. I'm sorry. Your --  
24 A. I'm sorry. C&E reports, contribution and  
25 expenditure reports. So it's a matter of public record.

1 will be October 2nd this year if you guys want to come  
2 in. And as part of that, there's, you know, various  
3 events that are individually sponsored or sponsored by  
4 people who give money to legislators, essentially.  
5 We also have policy convenings that are  
6 rare now because we've had a tremendous diversion of  
7 resources because of these voting rights issues, but --  
8 you know, there are other sponsored events, too. We did  
9 a Diez y Seis event at the Capitol.  
10 Q. I'm sorry. Could you say that again?  
11 A. Diez y Seis event at the Capitol. September  
12 16th is the Mexican-American independence, and there was  
13 grito at the Capitol. It was a big event with -- I  
14 think we partnered with some Latino television shows.  
15 It was a great event. I was not present, unfortunately,  
16 but I heard it was great. And during the session --  
17 which is not a sponsored event, but we had a huge  
18 concert for Mexican-Americans. I don't know if you  
19 recall. It was toward the end of the session. We had  
20 8,000 people come from Austin to hear our MALC members  
21 and a Latino musician come play at the Capitol. It was  
22 a great event.  
23 Q. Was that a fundraising event?  
24 A. No. We can't -- we're subject to the  
25 moratorium. We don't fundraise during session.

1 Q. Do you fundraise outside of session?  
 2 A. Yeah, you have to, you know, unless you have a  
 3 money tree. It would be great if you can plant one of  
 4 those, but --  
 5 Q. You mentioned policy convenings?  
 6 A. Correct.  
 7 Q. Could you describe those a little more?  
 8 A. I think three years ago we had an energy  
 9 convening where we had MALC members and important  
 10 decision-makers and other policy decision-makers come  
 11 together and talk about energy policy in Texas. It was  
 12 an amazing event. As a policy professional, I saw  
 13 honest bilateral dialogue on important matters that I  
 14 believe became an idea nursery for several of the  
 15 session's best ideas. Anyway, we have some of that, but  
 16 less than we used to because of the diversion of  
 17 resources.  
 18 Q. How many resources are required to put on one  
 19 of these policy convenings?  
 20 A. It depends. It's variable.  
 21 Q. Does MALC organize and execute these policy  
 22 convenings by itself?  
 23 A. Yes, largely. I'm not sure what you mean by  
 24 yourself. Maybe you can explain a little bit better.  
 25 Q. Are these policy convenings -- are they put on

1 by MALC in conjunction with some other organization that  
 2 helps split the cost of running such a meeting?  
 3 A. No. It's run by MALC.  
 4 Q. Okay.  
 5 A. I mean, we'll have sponsorships sometimes, but  
 6 mostly MALC staff, MALC funded.  
 7 Q. And how often are those typically held?  
 8 A. You know, when I first began working for  
 9 Trey -- when Trey first began at MALC, which was  
 10 December of 2008, we had several MALC meetings during  
 11 the session and we had -- I think we had a MALC  
 12 convening at the golf tournament, so a couple times a  
 13 year. And now I think we're down to one every two  
 14 years, roughly, so...  
 15 Q. What would you say is MALC's largest source of  
 16 funding?  
 17 A. You know, I don't know. I'm sorry. It may be  
 18 EFH or AT&T. But it's listed in our C&E reports, so I  
 19 think that's probably the best descriptor of where we  
 20 get our money from.  
 21 Q. What is EFH?  
 22 A. Energy Future Holdings. It's an energy  
 23 company that was part of the TXU private buy-out.  
 24 Q. So would you say your largest source of  
 25 funding comes from corporate donations?

1 A. I don't know. Again, I think the best source  
 2 of that is to review -- you can do a spreadsheet, and I  
 3 could do that for you if you'd like. But it's probably  
 4 from PACs, frankly, and not from corporations  
 5 themselves.  
 6 Q. But again, that information would be in the  
 7 C&E report --  
 8 A. Correct.  
 9 Q. -- that you mentioned?  
 10 A. Yes, sir.  
 11 Q. Do you know if any of those C&E reports have  
 12 been produced to the defendants in this litigation?  
 13 A. You know, I think they have been, but I -- I  
 14 know that we -- we've done a lot of document production,  
 15 so -- thousands of documents, I believe. I'm not sure  
 16 exactly what's in there. I know that if they were in my  
 17 computer, then you guys received them. But they are  
 18 also public documents that you can download, so...  
 19 Q. Where can they be downloaded from?  
 20 A. The Texas Ethics Commission. It's  
 21 www.tec.state.tx.us. And there's a prompt on the  
 22 left-hand side where you can do an advanced search. You  
 23 can look at all of MALC's and MALLF's, both their caucus  
 24 C&E reports.  
 25 Q. Does MALC prepare an annual budget?

1 A. Yes.  
 2 Q. And who has the ultimate authority over that  
 3 budget?  
 4 A. The chairman.  
 5 Q. So can the chairman decide to make last-minute  
 6 unilateral changes to that budget?  
 7 A. Surely. It rarely happens, but yes.  
 8 Q. Are the annual budgets of MALC publicly  
 9 available?  
 10 A. No.  
 11 Q. Does MALC budget or reserve space in its  
 12 annual budget for set dedicated operating funds?  
 13 A. I don't know what you mean by that. We have  
 14 budget categories. You know, there's a certain amount  
 15 for staff or for staff positions. There's a certain  
 16 amount for rent. Rent is very expensive. There's a  
 17 certain amount for, you know, our other policy  
 18 focuses -- foci. And large portions of that have been  
 19 dedicated for the last four years to voting rights,  
 20 so...  
 21 Q. Does MALC reserve any space in its annual  
 22 budget for funds that can be allocated on an as-needed  
 23 basis?  
 24 A. I don't know. I don't think so. I -- it's --  
 25 budgets are always documents of priorities, right, and

<p>1 they're also highly variable, depending on how much you 2 take in in terms of how much you raise. Right? 3 We try to keep a corpus of a certain 4 amount of money that we won't go below, and I think 5 we've gone below that. We are currently in the worst 6 budget situation that we've ever had since I've been 7 here, and it's almost entirely because of our -- the 8 last four years of voting rights litigation and advocacy 9 on behalf of MALC. 10 Q. Can you approximate a percentage of your 11 annual budget that's been dedicated towards voting 12 rights litigation? 13 A. I can't, but I can approximate a current 14 budget, my time. I get paid a certain amount, and 80 to 15 90 percent of my time is dedicated to voting rights 16 litigation. So voting rights takes up 80 percent of my 17 time with MALC. So that's less time for me to do policy 18 development. It's less time for me to work with members 19 about their own bills. It's less time for us to focus 20 on our core mission. 21 Q. You mentioned the core mission of MALC. Can 22 you describe generally the kinds of activities that MALC 23 regularly engages in in furtherance of its core mission? 24 A. We try to develop policies to advance that 25 core mission. We work with our members with their own</p>	<p>46</p> <p>1 time. They kind of get jammed together. 2 Q. So it was December 2010 is when your 3 involvement with MALC began? 4 A. One second. I'm sorry. I'm trying to 5 remember. It was 2009, because Pete was in the 6 legislature. He was the chairman right before Trey. 7 Q. When you say "Pete" -- 8 A. Pete Gallego. I'm sorry. Representative 9 Gallego at the time. But Trey was chairman for one 10 session when Pete wasn't. So that's why it was 2000 -- 11 so I was right. It was December 2008. I'm losing my 12 mind a little bit, so... 13 Q. Would this be a good time to take a short 14 break? 15 A. No. I'm square. I'm good. 16 Q. If you ever need to take a short break, please 17 just let me know. 18 A. I'll just leave, so I'll be fine. 19 Q. I'd appreciate it if you'd tell me before you 20 just leave. 21 A. I'm just teasing. 22 Q. Okay. Since you've been with MALC -- and 23 let's call that since 2008. 24 A. December, yes, sir. 25 Q. December 2008. What has MALC done to track</p>
<p>1 bills. We try to pass their agenda. We work with their 2 staffs to make sure that their staffs are the best 3 prepared that they can be. We try to speak with 4 unanimity on issues of importance with the 5 Mexican-American community, and generally do everything 6 you can to try to speak with one voice about matters of 7 importance to the community as a whole, which includes 8 things like, you know, press releases, policy agendas, 9 and every other public kind of statements you can make, 10 so... 11 Q. And what kinds of resources are devoted to 12 these core activities? 13 A. Financial resources, staff resources, and 14 time. 15 Q. So you said you started with MALC in 2008. Is 16 that correct? 17 A. That's when Trey began as chairman. I was his 18 chief of staff then. 19 Q. Okay. 20 A. It was my job to act as a liaison and to some 21 measure deliver his message to MALC staff at the time. 22 So I guess the MALC staff, in some way, were managed by 23 me. He was elected in December of 2008. 24 I'm sorry. I apologize. It was December 25 of 2010. I'm off by two years. I've worked for a long</p>	<p>47</p> <p>1 and follow voter ID legislation since then? 2 A. We help develop amendments. We certainly did 3 track the various voter ID bills that were filed at the 4 time. We helped develop procedural points of order and 5 questions of order. We developed Q and As for our 6 members and for the chairman to ask between the speaker 7 and he. We developed a strategy dealing generally with 8 all that, and we worked to try to prevent its passage. 9 Q. Does MALC consider the tracking of voter ID 10 legislation and the work you just described as part of 11 its core mission? 12 A. Yes. I think that's part of what we do, is -- 13 as a legislative organization, is to track legislation. 14 Q. Does MALC monitor voter ID legislation being 15 proposed or enacted in other states? 16 A. Generally. I think Texas is unique in many 17 ways, so the laws of Wisconsin or Pennsylvania or South 18 Carolina or Indiana or Georgia have tangential relevance 19 to what we do here. But as part of investigating any of 20 these things, you should know what they're doing in the 21 states. And so I know generally what they did, so... 22 Q. Do you recall any specific voter ID laws in 23 other states that MALC has specifically spent resources 24 tracking or following? 25 A. You know, I don't know the state, but I</p>

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1 remember one had a photo ID requirement with a waiver --  
 2 an affidavit pass. So you could sign a waiver saying  
 3 who you were. And there were less restrictive policies  
 4 considered in all states compared to Texas. And I'm  
 5 much more familiar with kind of the evolution of the  
 6 voter ID policy here, obviously. By my estimation, we  
 7 have the most stringent voter qualification law in the  
 8 states, but that's maybe a limited opinion, so...

9 Q. Does MALC communicate with members of other  
 10 state legislatures regarding these proposed voter ID  
 11 legislations in other states?

12 A. Not regarding voter ID. There are some  
 13 inter-caucus relationships through the Board of Hispanic  
 14 Caucus Chairs, and there was a legislator in -- a  
 15 Republican legislator in Florida who is very close with  
 16 my boss and Representative Anchia. So they may have  
 17 spoken about voter ID, but nothing formally between the  
 18 two caucuses.

19 Q. Do you remember who that legislator in Florida  
 20 was?

21 A. He's a really nice guy. I forget his name. I  
 22 can look it up and make my answer more full. I would  
 23 know him if I saw him. I apologize. I don't remember  
 24 his name. Nice guy, though. Smart guy.

25 Q. At the end of the deposition, I'll give you an

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1 MALC regarding its stances or positions in regards to  
 2 voter ID legislation in Texas?  
 3 A. They haven't. I hope that they would, because  
 4 several of our members are very -- have a deep knowledge  
 5 of this area and how it affects the Latino community.  
 6 And I think that however it affects the Latinos here in  
 7 Texas, it probably affects them in Nevada the same way  
 8 or California or New Mexico, Arizona, all throughout the  
 9 American Southwest. I would hope we could be a model  
 10 for them.

11 Q. So y'all don't have any direct communication  
 12 with members of other state legislatures regarding voter  
 13 ID legislation. Do y'all exchange documents or  
 14 materials with other members of other state legislatures  
 15 regarding voter ID legislation?

16 A. No, not to my knowledge. We haven't yet.

17 Q. Does MALC engage in any kind of activities  
 18 related to voter registration?

19 A. Only through our membership, but nothing  
 20 directly by the caucus itself. I think it would be  
 21 inappropriate for MALC to do that.

22 Q. When you say only through your membership,  
 23 what does that mean?

24 A. If the legislators themselves do a voter  
 25 registration drive -- they're members of MALC, but

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1 opportunity to clarify or amend any kind of answers, so  
 2 if you think about it between now and then --

3 A. Surely.

4 Q. -- you will have an opportunity to state it at  
 5 the end.  
 6 A. Surely.  
 7 Q. So sorry. Just to get back to voter ID being  
 8 proposed in other states and communications with members  
 9 of other state legislatures about voter ID legislation.

10 Did you testify that MALC does not  
 11 communicate with other states regarding voter ID laws?  
 12 A. That's correct. I think that we've sent some  
 13 letters -- I remember a letter before Trey was  
 14 chairman -- I think Pete sent a letter to the Illinois  
 15 legislature. And there was a time in which the Delaware  
 16 legislature wanted to form its own Latino caucus, and I  
 17 think that Representative Gallegos, now Congressman  
 18 Gallegos, had discussed the bylaws. And I think that  
 19 MALC is a model for these various legislative groups.  
 20 That's what I meant. There was nothing formal there,  
 21 but there has been some inter-caucus communications, but

22 I can't speak to the depth of it for voter ID.  
 23 Q. So if there were a legislative caucus in  
 24 another state that was dealing with or opposing a voter  
 25 ID legislation, would they ever reach out or contact

1 they're doing a voter registration drive for whatever  
 2 reason. So through our members they register voters,  
 3 but nothing directed because of the caucus actions.

4 Q. So if a member of MALC engages in any kind of  
 5 activity related to voter registration, are they doing  
 6 so in their individual capacity as a legislator and not  
 7 as a member of MALC?

8 A. I think that's correct.

9 Q. So is it correct to say that MALC does not  
 10 expend any resources towards voter registration  
 11 activities?

12 A. Voter registration?

13 Q. Yes.

14 A. No.

15 Q. Does MALC engage in any kind of activities  
 16 related to voter education?

17 A. Absolutely.

18 Q. Could you describe those activities?

19 A. We are an information hub about the law, and  
 20 so our duty is to inform our members so they can inform  
 21 the constituents how various laws might affect them,  
 22 specifically SB 14. Over the last -- since SB 14 began  
 23 to be enacted last year, we have received lots of  
 24 requests by legislators about what the law means and how  
 25 they can talk to the constituents about the law, what

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1 their requirements are. And so MALC has been a resource  
 2 for voter education for the members themselves.  
 3 And there's also been members of the  
 4 community who would call up and ask what does the law  
 5 mean, and we would tell them to the best of our  
 6 knowledge, to give them resources as best we can.

7 We have an electronic newsletter that we  
 8 send out every week called The Caucus, and voter ID  
 9 has -- and SB 14 and its requirement have been a central  
 10 part of each of those, which I think we gave to you in  
 11 our document productions. Also our public statements,  
 12 where we try to educate voters about the effects of  
 13 voter ID and what the requirements are in order to  
 14 educate them for their vote, have been prominent. We've  
 15 also given you those things, too.

16 So it's my experience that we've devoted  
 17 a lot of resources to be an information hub to voter  
 18 educate on this issue, so...

19 Q. So do y'all expend or commit resources to  
 20 educate both members of MALC about voter ID laws and  
 21 constituents of members of MALC about voter ID laws?

22 A. I think that's right. I think that The Caucus  
 23 doesn't just go out to members. And our public  
 24 statements obviously travel wherever they go. And so I  
 25 think that it's for the public and for the members

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1 SB 14.  
 2 Q. When you say "a radical uptick," can you  
 3 exemplify that by a certain percentage?  
 4 A. I think it's very difficult to empirically say  
 5 X amount of time or money was spent on this issue  
 6 because there's lots of indirect costs that you may not  
 7 be aware of or you might miss.

8 I will just say this: When we began  
 9 working as a chairman, Trey had a vision for MALC to  
 10 have a broad, comprehensive policy horizon that changed  
 11 the way in which MALC and Latino issues were talked about.  
 12 We've done some part of that, but his goal for MALC was  
 13 to be able to talk about roads, transportation, energy,  
 14 and to devote staffers to those core concepts. We've  
 15 been unable to do that because of the last four years  
 16 with the diversion of resources in order to answer the  
 17 clarion call to combat this bill and its law.

18 Q. But when you say "a radical uptick in  
 19 resources," what is that based on?

20 A. My prior knowledge of the budget. I just know  
 21 that we had a vision to hire policy analysts for complex  
 22 financial transactions. We had a vision to talk about  
 23 transportation and water policy and a more complex and  
 24 fundamental way to kind of change the way in which  
 25 people thought about Latino policy, and we've been

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1 themselves.  
 2 Q. Can you tell me what kinds of resources are  
 3 committed towards voter education activities?

4 A. First you have to understand the law in order  
 5 to talk about it. So much of my job is to suss out the  
 6 law and understand it. So some portion of my salary is  
 7 dedicated to that.

8 Our public statements via press releases,  
 9 Facebook responses, or through our caucus, are written  
 10 by staff. There is staff time devoted to that. It  
 11 costs money to do those things. The cost of contact --  
 12 I think we actually use a different email platform that  
 13 costs money each month to -- you have to develop the  
 14 words for this. There's editing involved in that.

15 Anyways, long story short, I think that  
 16 lots of staff time is diverted from our core purpose,  
 17 which is policy development and member relations, to  
 18 educating on this topic, so --

19 Q. Did MALC commit resources towards voter  
 20 education purposes prior to SB 14?

21 A. Not to my knowledge. There may have been some  
 22 resources committed to talk about the law generally, but  
 23 there's been a radical uptick -- a logarithmic increase  
 24 in the amount of money, time, staff that we spent  
 25 educating our members and the public at large about

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1 fundamentally unable to do those things because of our  
 2 diverted focus to voting rights issues. And I guess I  
 3 could -- I'm not sure how I could empirically show it to  
 4 you, but I just know it's true, so...

5 Q. Does MALC engage in any kind of activities  
 6 related to assisting voters during elections?  
 7 A. Only through voter education. I assume by  
 8 assisting voters you mean helping them to the polls or  
 9 GOTV effort. That would be inappropriate for a (c)3 or  
 10 a (c)6.

11 Q. When you say "GOTV," is that get out the vote?  
 12 A. That's correct. We don't do that. We just --  
 13 we voter educate as much as we possibly can.

14 Q. Do you have any knowledge of MALC's policy or  
 15 advocacy-related work with regard to voter ID  
 16 legislation prior to December 2008?

17 A. Surely.

18 Q. Could you describe MALC's policy or advocacy  
 19 working prior to 2008 with regard to voter ID  
 20 legislation?

21 A. Yes. It's the same general thing. We did  
 22 lots of amendments, lots of Q and A, lots of points of  
 23 order by and through our membership and their staffs to  
 24 try to defeat the bill in 2005, 2007, 2009. If you look  
 25 back at the chubathon, lots of those people doing the

<p>1 chubathon were MALC members. Representative Raymond, I  2 think, had almost a whole day to himself where he talked  3 off a whole bunch of bills. So I think that MALC  4 members have played a central role in advocating against  5 the bill in its various forms.</p> <p>6 Q. When you say "chubathon," is that in reference  7 to the practice known as chubbing?</p> <p>8 A. Yes, sir.</p> <p>9 Q. And what is chubbing?</p> <p>10 A. It's where you elongate the time on a bill,  11 longer than it normally would take, either through Q and  12 A or just long talking.</p> <p>13 Q. Is that a procedural tactic that MALC  14 regularly employs?</p> <p>15 A. Not regularly, but it happens -- legislators  16 employ it. I think it happens once a session; although,  17 I can't point to a time this last session when it  18 happened. Toward the end of any deadline, I think  19 there's always kind of a legislative desire to start  20 hitting the bricks. This was much different. This was  21 a concerted caucus-wide effort to defeat a bill by  22 literally talking off 150 bills off the calendar. It  23 was amazing.</p> <p>24 Q. Do you remember what bill was defeated in that  25 instance?</p>	<p>58</p> <p>1 would publicize its support or opposition to a voter ID  2 bill?</p> <p>3 A. By and through its members and public  4 statements issued by the caucus itself, public  5 statements issued by members of the Executive Committee  6 or the chairman. I don't know if we ever did a policy  7 paper on it, but we may have. Representative Anchia had  8 several statements. He's a member of MALC. I think  9 that's exhaustive. There may be some things I'm missing  10 like social media, but I don't think our social media  11 really began until a little bit later, so...</p> <p>12 Q. Does MALC have a Twitter account?</p> <p>13 A. You know, I think we do. I don't think it's  14 operational. Usually Trey's Twitter account is kind of  15 the central point for public statements, either as Trey  16 or as MALC chairman.</p> <p>17 Q. But MALC employs various modes of social media  18 to communicate with its members and the constituents of  19 its members. Is that correct?</p> <p>20 A. Yes, sir. And the public at large. Right.</p> <p>21 Q. Sure.</p> <p>22 A. I don't think I can --</p> <p>23 Q. So has MALC been engaging in voter education  24 activities related to various voter ID bills since 2004?</p> <p>25 A. I can't speak to 2004, 2005. I can only speak</p>
<p>1 A. It was the Troy Fraser bill. I think it was  2 SB 362, if I recall correctly. But again, the numbers  3 kind of come together in my -- and it wasn't necessarily  4 his bill that was talked off. His bill was on the  5 calendar, and there was an intervening local calendar.  6 And so the local calendar took six days to get through,  7 five or six days, which it would normally take four or  8 five hours.</p> <p>9 Q. Was that in 2009?</p> <p>10 A. Correct.</p> <p>11 Q. Has MALC ever taken a public position in  12 support for or in opposition of a voter ID-related bill?</p> <p>13 A. I think so. I think that we had some press  14 releases against the bill. I think Trey's public  15 statements as MALC chairman were against the bill. I  16 think that we provided those to you as much as we had  17 them in our custody.</p> <p>18 Q. When you say "the bill," do you mean SB 14?</p> <p>19 A. That's correct. All the bills. I'm trying to  20 remember -- I don't remember, in 2005, if there was a  21 concerted press release issued by Chairman Gallego at  22 the time, and I don't remember in '07 and '09 directly,  23 but I know that Trey has made various statements, and  24 certainly in '09 and '11 against the bill, so...</p> <p>25 Q. Could you describe all the ways that MALC</p>	<p>59</p> <p>60</p> <p>1 to the recent uptick since the bill has been passed.  2 Voter education is probably not necessary if there is --  3 the bill hasn't been passed or implemented. Right?</p> <p>4 Although, sometimes I think members  5 receive questions or MALC receives questions saying, "Do  6 I have to bring my ID or not?" Right? That's a form of  7 voter education. But before the passage we would say,  8 "No," and after the passage we would say, "Yes."</p> <p>9 I would just say generally there has been  10 a tremendous increase in the amount of information  11 requested and provided by MALC on this issue, so....</p> <p>12 Q. And when you say "this issue," you mean SB 14?</p> <p>13 A. Correct, the implementation of SB 14.</p> <p>14 MR. TATUM: Can we take a quick break for  15 a few minutes?</p> <p>16 MS. RUDD: That would be great.</p> <p>17 THE WITNESS: Surely.</p> <p>18 MR. TATUM: We'll go off the record.</p> <p>19 (Recess from 10:41 a.m. to 10:49 a.m.)</p> <p>20 (Exhibit No. 2 marked)</p> <p>21 Q. (By Mr. Tatum) Mr. Golando, I'm handing you  22 what's been marked as Exhibit 2. And I believe you  23 stated that you reviewed this document, but just to make  24 sure: Do you recognize what this document is?</p> <p>25 A. I believe this is what I reviewed.</p>

1 Q. And what is this document?  
2 A. It's our intervention, I believe, or our  
3 complaint. I get confused between the two.  
4 Q. I'll represent to you that this is the  
5 complaint that initiated MALC's involvement in this  
6 lawsuit. Did you assist with the preparation of this  
7 document?

8 A. No. Sadly.

9 Q. Is it true that MALC does not claim that SB 14  
10 causes injury to any of its members?

11 A. I believe that's true in the following way.  
12 I've thought about this deeply for a while, and I think  
13 that the passage of the bill did harm our members. I  
14 think it's harmful whenever the State of Texas passes a  
15 racist law, and in that sense it harms members of the  
16 minority community and their representatives very  
17 gravely.

18 So I think that -- I'm not sure what's  
19 said in the complaint on that score, but I believe that  
20 there has been an immeasurable but serious harm to my --  
21 the members of my organization.

22 Q. Mr. Golando, I ask that question because I  
23 have an email from one your counsel, Ms. Lindsey Cohan,  
24 stating that MALC is not asserting individual injury to  
25 any of its members.

1 conclusion.  
2 A. Yes, organizationally, I think that's right.  
3 Q. (By Mr. Tatum) Is MALC asserting the rights  
4 of the constituents of its members in this lawsuit?  
5 A. To the degree that we represent the  
6 Mexican-American community, of course.  
7 Q. Is that because MALC believes that SB 14  
8 denies or abridges the right to vote of constituents of  
9 MALC members?  
10 A. Correct.  
11 Q. Do members of MALC believe that SB 14 will  
12 affect their constituents' ability to elect or reelect  
13 them?  
14 A. Yes.

15 Q. With regard to standing, is it MALC's position  
16 that it is only representing the interests of itself as  
17 an organization in joining this lawsuit?

18 MS. RUDD: Wait. Can you repeat that,  
19 Stephen?

20 MR. TATUM: Sure.

21 Q. (By Mr. Tatum) On the issue of standing, is  
22 it MALC's position that it is only representing the  
23 interests of itself as an organization in joining this  
24 lawsuit?

25 MS. RUDD: Objection; calls for a legal

1 MS. RUDD: Okay. Let me just clarify  
2 that. I believe our position is that MALC is not  
3 asserting individual injury to any of its members for  
4 purposes of proving standing in this case. I think  
5 that's a separate question from whether or not as an  
6 esoteric matter SB 14 and voter ID legislation has some  
7 form of harm or creates some sort of injury for members  
8 generally speaking. But that's certainly true for  
9 purposes of standing, Stephen.

10 MR. TATUM: Okay.

11 Q. (By Mr. Tatum) Okay. So, Mr. Golando, do you  
12 agree that for purposes of standing, MALC is not  
13 asserting individual injury to any of its members  
14 because of SB 14?

15 MS. RUDD: And I'm just going to object  
16 to the extent that that calls for a legal conclusion.  
17 A. I guess that's true. I would say that none of  
18 the members are probably going to be directly affected  
19 by voter ID. None of them are going to be prevented  
20 from voting. But again, I reassert that there is  
21 immeasurable harm when a racist law is passed and harms  
22 members of the minority community the most.

23 Q. (By Mr. Tatum) So is MALC asserting the  
24 rights of its members in this lawsuit?

25 MS. RUDD: Objection; calls for a legal

1 conclusion.  
2 A. I don't really know the parameters of  
3 standing. I mean, I do, because I'm an attorney, but  
4 I -- what I will say is that MALC sought this because --  
5 in the interest of its members in the community and as  
6 an organization. So I'm not sure that answers your  
7 question, but maybe if you say it again, I'll try to do  
8 it.

9 Q. (By Mr. Tatum) Well, let me just ask: Why  
10 did MALC join this lawsuit?

11 A. Because we believe that members of our  
12 community and the legislators themselves will be deeply  
13 harmed by its passage and have been.

14 Q. When did MALC first learn of this lawsuit?

15 A. This one -- the Section 2 one?

16 Q. Yes.

17 A. In the fall of 2013.

18 Q. And how was it decided that MALC would join  
19 this lawsuit?

20 MS. RUDD: Okay. I'm going to object to  
21 the extent that calls for you to reveal any  
22 communications, Marty, that were had between you and the  
23 organization in your capacity as an attorney or with  
24 other attorneys for MALC in determining what to do in  
25 this lawsuit.

<p>1 A. On the advice of counsel, I think I can't -- I 2 don't think I can discuss that without going into the AC 3 privilege.</p> <p>4 Q. (By Mr. Tatum) Okay. Mr. Golando, were there 5 meetings held to discuss the possibility of joining this 6 lawsuit?</p> <p>7 A. There was not a formal MALC meeting.</p> <p>8 Q. Were there informal MALC meetings held?</p> <p>9 A. I don't know if Trey talked to other members 10 or not generally. I'm sure that he did informally, and 11 I'm sure that this came up, voter ID generally, its 12 implementation and whether or not we would join or 13 intervene, but I don't know for sure.</p> <p>14 Q. Who within MALC made the ultimate decision to 15 join this lawsuit?</p> <p>16 A. The chairman.</p> <p>17 Q. Representative Martinez Fischer?</p> <p>18 A. Correct.</p> <p>19 Q. Was that a unilateral decision?</p> <p>20 MS. RUDD: Objection; vague.</p> <p>21 A. And again, I don't have any specific knowledge 22 of his conversations with other representatives, so I 23 don't know if it was unilateral in the sense that he 24 decided it solely. I think it was probably a consensus 25 decision between he and other members. But again, I</p>	<p>66</p> <p>1 know what general inferences the public made from that.</p> <p>2 Q. Did MALC consider the input of its members or 3 constituents leading up to its decision to join this 4 suit?</p> <p>5 A. Certainly.</p> <p>6 Q. And how was that input sought?</p> <p>7 A. Through the public statements of members 8 themselves. And I'm sure that representatives had 9 conversations about the implementation of SB 14 and how 10 it would affect other members and their constituents.</p> <p>11 I'm sure he is privy to conversations that I wasn't 12 privy to.</p> <p>13 Q. Did you provide any legal advice to the 14 chairman regarding the decision to join this suit?</p> <p>15 A. Yes.</p> <p>16 Q. Did the chairman receive legal advice from 17 attorneys other than yourself leading up to the decision 18 to join this suit?</p> <p>19 A. Yes.</p> <p>20 Q. Do you know if the chairman received legal 21 advice from members of other organizations such as the 22 NAACP or Texas League of Young Voters leading up to the 23 decision to join this suit?</p> <p>24 A. I don't think so. I don't think he had any 25 contact with Mr. Bledsoe or Mr. Notzon, other than</p>
<p>1 have no specific knowledge of any direct conversation he 2 had with another representative.</p> <p>3 Q. (By Mr. Tatum) Based on what you do know 4 about MALC, would the decision -- would the action taken 5 to join this lawsuit be the result of a vote amongst the 6 Executive Committee?</p> <p>7 A. Not likely.</p> <p>8 Q. Is it likely that the decision to join this 9 lawsuit was made solely by the chairman of MALC?</p> <p>10 A. By and through his discretion given to him by 11 the bylaws, likely, but I don't know, again. There may 12 have been informal talks or not.</p> <p>13 Q. Do you know if any representatives of MALC met 14 with any other parties to this suit to discuss the 15 possibility of joining this suit?</p> <p>16 A. I don't know.</p> <p>17 Q. Did MALC publicize that it was considering 18 joining this suit?</p> <p>19 A. By "publicize," do you mean to the public at 20 large?</p> <p>21 Q. Yes.</p> <p>22 A. I don't think so; although, we had been 23 involved in the Section 5 suit. I think it would be a 24 natural assumption on behalf of people in the know that 25 we would seek Section 2 relief possibly. So I don't</p>	<p>67</p> <p>1 redistricting. They would have talked about 2 redistricting probably. And Texas League of Young 3 Voters, I know the attorney's -- I can see his face. I 4 just don't know his name. I'm sure that Trey would 5 never -- has never spoken to him, so...</p> <p>6 Q. Are you aware that the United States is a 7 party to this lawsuit represented by the Department of 8 Justice?</p> <p>9 A. Yes, sir.</p> <p>10 Q. At any time did MALC urge the Department of 11 Justice to sue the State of Texas over SB 14?</p> <p>12 MS. RUDD: And I -- I mean, I guess you 13 can answer the question.</p> <p>14 A. I'm trying to think if we --</p> <p>15 MS. RUDD: I just want you to be careful 16 about the attorney-client privilege to the extent there 17 are any communications prior to the filing of the 18 lawsuit that were attorney-related communications or any 19 legal advice.</p> <p>20 A. And just to be clear, what you mean by this 21 lawsuit, you mean the Section 2 lawsuit, not the 22 Section 5 matters --</p> <p>23 Q. (By Mr. Tatum) Yes. I'm referring to the 24 litigation that brings us here today.</p> <p>25 A. I don't think so. I don't think any MALC</p>

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1 members to my knowledge or MALC as an organization sent  
2 a letter to the DOJ saying, "Please sue." I don't think  
3 that happened. I think if there was advocacy, it was  
4 limited to just, "We think this is a bad law. Something  
5 should be done," and it was probably mostly done in  
6 relation to Section 5 and not Section 2.

7 Q. Does MALC feel that its interests are not  
8 adequately represented by the United States of America  
9 in this lawsuit?

10 A. Yes.

11 Q. And why is that?

12 A. I think that there are unique requirements for  
13 Latino-elected officials and their constituents that  
14 aren't necessarily represented by the DOJ. I say that  
15 with all respect to the DOJ, so...

16 Q. Is MALC as an organization harmed by SB 14?

17 A. Yes.

18 Q. In what ways is MALC harmed by SB 14?

19 A. For the last four years, roughly, we have  
20 diverted a tremendous amount of financial resources and  
21 staff time and other resources to educate the public  
22 about its effects and to combat its implementation.

23 Q. Can you tell me what portion of MALC's annual  
24 budget is diverted towards educating Texans specifically  
25 about SB 14?

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1 Q. In what way has MALC been unable to fulfill  
2 its mission because of SB 14?

3 A. The mission of MALC is to have a comprehensive  
4 voice about all matters of importance to the  
5 Mexican-American community, to provide assistance to our  
6 member legislators and their staffs in order to further  
7 that goal. The comprehensive goal is not just related  
8 to the traditional civil rights issue.

9 Like I said before, Trey's goal for the  
10 caucus was to have a diverse and new policy horizon for  
11 MALC members and Latino policy. That current goal is  
12 under serious constraints because of our diversion of  
13 resources. It's sad, but it's true.

14 Q. Does MALC consider its SB 14-related  
15 activities as outside the scope of its mission?

16 A. The voter education portion -- I wouldn't say  
17 it's necessarily outside the scope of the mission, but  
18 it certainly has taken away from the core mission which  
19 is a comprehensive policy voice. Comprehensive means  
20 more than just one thing. Right? If we wanted to talk  
21 about water or transportation, complex financial  
22 transactions, other issues that aren't considered Latino  
23 issues, we wanted to change that, and we have been  
24 unable to do so because of the devotion of the time and  
25 resources to this issue, so...

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1 A. The portion -- about 80 percent of my salary  
2 is devoted to voting rights -- 80 percent of my time and  
3 therefore 80 percent of my salary, whatever it is, has  
4 been devoted to voting rights issues in Texas generally.

5 I think that whatever space that we have  
6 in our electronic correspondence, our weekly newsletter,  
7 its cost -- and usually one-third of the copy is devoted  
8 to SB 14 or voter ID or status update on litigation. So  
9 whatever the monthly cost of that is.

10 Plus the staff time itself. We're not  
11 hourly. We're flat rate, and so it's hard to determine  
12 what percentage, but a significant percentage. It's  
13 prevented us from having lots of policy convenings that  
14 we might want. And most recently I think that a good  
15 example is that we have a border crisis right now for  
16 UACs, unaccompanied children, and it would be a  
17 traditional role of MALC to play a bigger role, have a  
18 convening, talk about what the needs are for border  
19 protection and how we can ameliorate this immediate  
20 situation, and we haven't been able to focus on it  
21 because of the diversion of staff time and focus and  
22 financial resources, unfortunately.

23 Q. Does MALC contend that it is unable to fulfill  
24 its mission because of SB 14?

25 A. Yes, in part.

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1 Q. Do you know what percentage of MALC's  
2 financial resources have been diverted towards the  
3 litigation of this lawsuit?

4 A. This lawsuit, we've been lucky enough to have  
5 little litigation expenses associated with this. We had  
6 a lot more travel during the Section 5 trial. Mr.  
7 Garza's salary, some part of it has been devoted to  
8 this. And obviously, some portion of my salary is  
9 devoted to this; although, I'm not involved with the  
10 litigation, more the voter education policy development  
11 side of it. I guess it's a mixed bag. I couldn't say  
12 specifically, but there has been some resources -- some  
13 significant financial resources devoted -- I guess -- a  
14 bunch, I guess.

15 Q. Who is Mr. Garza?

16 A. He is my co-counsel in the redistricting  
17 matter. He's also lead counsel for some of the  
18 individual intervenors in this case, and he advises the  
19 representative on voting rights matters.

20 Q. And redistricting matters?

21 A. Yes, he's the counsel on redistricting. But  
22 to be clear, some portion of his salary throughout the  
23 last three years has been dedicated to voter ID.

24 Q. Has MALC publicized its participation in this  
25 lawsuit?

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1 A. Yes, I believe so.  
 2 Q. In what ways?  
 3 A. Press releases. I think we did a press call  
 4 when we intervened. Trey talks about the litigation  
 5 generally. We do less talking about it and more voter  
 6 education now than we used to. But, yes, we certainly  
 7 talk about it publicly.

8 Q. In the course of publicizing its involvement  
 9 in this lawsuit, has MALC sought donations or  
 10 contributions from its normal sources of funding?

11 A. Do you mean is voter ID something we  
 12 fundraised off of? Is that your question?

13 Q. Yes.

14 A. No. You can't fundraise off of voter ID.

15 Q. Why not?

16 A. It's deeply controversial. So our traditional  
 17 sources of funding are from institutional givers to  
 18 legislators. Right? Those legislators have a  
 19 multifaceted business, and they don't want to give  
 20 to controversial groups. In fact, our fundraising  
 21 levels have slowly decreased over time, in part because  
 22 of our intervention and complaint in this lawsuit. You  
 23 can't fundraise off this issue. You just can't. It may  
 24 give you cachet because you're a voting rights leader,  
 25 and that means something in the Latino community, but

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1 may be more supportive of redistricting efforts that  
 2 MALC has been under, but it's less true for voter ID.  
 3 But I don't know for certain if any of  
 4 the statements -- any of the money we receive from  
 5 certain PACs, if those PACs themselves have said, "We  
 6 support voter ID or your efforts."

7 I don't recall, so -- but it would  
 8 be -- if it did, it would be a very small percentage of  
 9 the financial undertaking, so...

10 Q. So is it your testimony that MALC has seen its  
 11 donations and or sponsorships decrease as a result of  
 12 its involvement with this lawsuit?

13 A. This and other lawsuits, yes, I think that  
 14 that's empirically true. And our costs have  
 15 skyrocketed.

16 Q. You mentioned that costs have skyrocketed, but  
 17 I believe it was your testimony that you had minimal  
 18 costs related to this litigation. Is that --

19 A. I thought you meant litigation. Other costs  
 20 have skyrocketed, like voter education and other  
 21 efforts. That's how I understood your question, so...

22 Q. Again, I don't want to mischaracterize your  
 23 testimony. How would you describe the resources of MALC  
 24 that have been devoted to the litigation of this  
 25 lawsuit?

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1 there's no way you can fundraise off it meaningfully.

2 Q. Has MALC attempted to fundraise off of SB 14?

3 A. No, sir.

4 Q. Does it have any plans to attempt to fundraise  
 5 off of SB 14?

6 A. No, sir.

7 Q. Is that because it believes it's just not  
 8 possible to do so?

9 A. Not meaningfully possible. I don't think  
 10 that's -- I don't think I can go to our institutional  
 11 givers and say, "Hey, fund this lawsuit. And by the  
 12 way, give us more money." That's not the way it works,  
 13 so...

14 Q. Do you think that some of your organizational  
 15 givers might agree with your involvement in this  
 16 lawsuit?

17 A. They may individually, but certainly the  
 18 organizations that they represent probably would not;  
 19 although, some of them may. A very small percentage  
 20 may.

21 Q. Have any of these organizations expressed  
 22 support for MALC's involvement in this lawsuit?

23 A. I'm trying to think. I believe that -- in  
 24 this lawsuit? That's more true for redistricting,  
 25 because if you represent a PAC that's a labor union, you

1 A. Some portion of my salary, some portion of  
 2 Mr. Garza's salary. Salary is kind of a loose term  
 3 here. It's just what MALC pays them. Some portion of  
 4 the -- our public statements, whatever they cost to  
 5 generate by staff or by the Executive Director, some  
 6 portion of our fixed costs associated with electronic  
 7 distribution there, some portion of our administrative  
 8 costs devoted to dealing with staff and paper,  
 9 et cetera, some portion of our rent, right, because  
 10 we've had some legal meetings about this litigation  
 11 between me and Mr. Garza and the representative there.

12 I mean, there's lots of indirect costs  
 13 that you could add up, but it adds up to a pretty big  
 14 number, I imagine, in terms of constraints. Our travel  
 15 costs during the Section 5 trial.

16 Q. Would the allocation of resources towards the  
 17 litigation of this lawsuit, would -- those be evident in  
 18 the C&E documents that you referenced earlier?

19 A. They would largely be evident. The travel  
 20 would be apparent, because it would have been during the  
 21 Section 5 trial. You would see a plane ticket for me or  
 22 Mr. Garza, and the costs for lodging. So that would be  
 23 during -- I guess that was July of 2012.

24 You would see my salary. As I said, some  
 25 portion of my salary is dedicated to this litigation and

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1 to voter education generally.  
2 Mr. Garza is less apparent because he's  
3 more of a mixed bag. He gets paid more for  
4 redistricting than I do, but some portion is for voter  
5 ID. And I couldn't tell you -- month to month it  
6 changes, so -- and so you'd figure some portion of the  
7 amount of money we spent to distribute our electronic  
8 newsletter, some portion of Lindsey's salary, because  
9 she's the one who helps generate that content.

10 Q. I'm sorry. Who?

11 A. Lindsey Rodriguez. She's one of the policy  
12 analysts we talked about before. Some portion of  
13 Summer's salary who runs the caucus, because we had to  
14 devote time to preparing for all the stuff.

15 I guess my point is that the costs may be  
16 nominal compared to redistricting, but they are  
17 certainly larger than they normally would be, and they  
18 are daunting to my caucus, so...

19 Q. Mr. Golando, I just want to be clear that when  
20 I'm asking you about costs associated with this  
21 litigation, I mean the Section 2 litigation.

22 A. Okay. I'm sorry.

23 Q. I'm not referring -- I'm not talking about  
24 redistricting. I'm not talking about Section 5  
25 preclearance. I'm talking about the Section 2 case that

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1 set costs. Right?  
2 Obviously my salary is devoted largely to  
3 voting rights. Summer's salary in part is for handling  
4 logistical issues and running litigation and SB 14  
5 generally. Lindsey, lots of our public statements are  
6 about voter ID, so lots of her content is about voter  
7 ID. Nathan does video, so I think we had some videos  
8 related to voting rights generally, so some part of his  
9 stipend. I can't estimate the paper. Rent, obviously  
10 some portion of their salaries is devoted to that, and  
11 we've had meetings about voter ID at MALC. Obviously  
12 it's related in some way.

13 It's very difficult to say. I just know  
14 that we've devoted more resources than I can currently  
15 measure for you, and it's been tremendously daunting for  
16 my caucus.

17 Q. So MALC does not have any kind of discernible  
18 or tangible measure for the exact percentage of its  
19 resources that have been diverted towards SB 14-related  
20 activities. Is that right?

21 A. I don't think that's fair. I think that it's  
22 really difficult to untwine employment. Right? I do a  
23 lot of things for MALC. So does Summer. And there are  
24 hills and valleys in terms of what you're focusing on.

25 What I can speak to is that the last --

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1 we're currently involved in.  
2 A. I apologize. So there's no travel, then. But  
3 some portion of Mr. Garza's salary since fall has been  
4 devoted to voter ID. Some portion of my salary has  
5 been. Again, the others would stay the same, generally,  
6 so...

7 Q. When you say a portion of your salary, does  
8 that mean a portion of your already set salary, or has  
9 your salary been increased because of your work with

10 this case?

11 A. Recently it's been increased. I used to get  
12 about \$1,000 from MALC a month, and now I get \$1,600  
13 roughly a month, and it's been increased in part because  
14 of our increased needs for voting rights. Not a lot of  
15 money, but it's a lot of money to me, so --

16 Q. Not making a judgment on any of that.

17 Do you know specifically what portion of  
18 the kind of set costs that you referenced earlier have  
19 had to have been diverted towards SB 14-related  
20 activities?

21 A. Again, it's very difficult to say. So our set  
22 costs are salary costs, rent, and other things like what  
23 you pay for your newsletter distribution, what you pay  
24 for your list, what you pay for your copier, et cetera,  
25 what you pay for paper, what you pay for -- those are

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1 since fall of 2011, and since the implementation of  
2 SB 14, I guess last year, since the vacation -- I guess  
3 that would be 2012 -- no. 2013. I'm sorry -- there's  
4 been a tremendous amount of focus, time, and some money  
5 devoted to educating our members, their constituents  
6 about this issue. Just because I can't give you a  
7 percentage today like 65 percent, what would that mean  
8 other than what you can measure? I mean, how do you  
9 measure staff time?

10 Q. Let me ask you more broadly.

11 A. Please.

12 Q. Let's picture a pie chart. A circle graph  
13 that's divided up, and this graph depicts, you know, how  
14 much -- how many resources are devoted to X activity,  
15 how many resources are devoted towards Y activity,  
16 et cetera.

17 If we were looking at this pie chart for  
18 the resources of MALC, how big would the slice be that's  
19 devoted towards SB 14-related activities? Without  
20 putting a specific percentage on it, just roughly how  
21 big would it be?

22 MS. RUDD: Objection; calls for  
23 speculation.

24 A. Probably a third, maybe more, maybe less.  
25 It's larger for voting rights generally. It's probably

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1 two-thirds, maybe 75 percent for voting rights  
 2 generally. And they're all related in my mind.  
 3 Again, I don't know what -- how good a  
 4 predictor it is, but -- or a pie chart would be, but  
 5 some portion of my salary of the last month has been  
 6 dedicated to talking to legislators about legislative  
 7 privilege and what documents they have to turn over.  
 8 That's been really intense the last four weeks, lots of  
 9 questions, lots of concern on the staff. So recently  
 10 there has been, you know, a real big hill. There may  
 11 have been a valley sometime after our intervention. I  
 12 guess it's really hard to say.

13 Q. (By Mr. Tatum) What did that hill look like  
 14 when MALC filed its complaint on September 17th, 2013?

15 MS. RUDD: Objection; calls for  
 16 speculation.

17 A. We spent a lot of time preparing for the  
 18 intervention, about our public statements. Trey takes  
 19 his public statements on MALC very seriously. We spent  
 20 some time talking about what kind of travel it might  
 21 require to go to Corpus. We spent some time talking  
 22 about what Mr. Garza's role would be and what my role  
 23 would be and devoted salary to that goal -- or money,  
 24 frankly.

25 So not quite the hill it's been the last

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1 lost a staffer to the TDP last fall in part because we  
 2 couldn't pay him what he was worth.  
 3 I left state employment in part because I  
 4 wanted to create budgetary space for us to not lose  
 5 people. That's part of the reason I left, because you  
 6 can kind of have a hybrid employment between the caucus  
 7 and trades a capital staff. Right?  
 8 And so I think that our financial  
 9 troubles have been exacerbated by our voter education  
 10 efforts and our efforts involving SB 14.

11 Q. I think you mentioned earlier that MALC has  
 12 four staff employees. Is that correct?

13 A. Counting myself, and I'm not sure you can call  
 14 me an employee, necessarily, because I don't get a W-2  
 15 from them, but I think that's right.

16 Q. Okay.

17 A. We have one part-time employee, one -- and two  
 18 full-timers, and me, and then I think we have -- I think  
 19 they're actually interns, whom I haven't met yet, but  
 20 we've got some interns.

21 Q. So that's current number of employees?

22 A. Current. Current.

23 Q. How many employees did MALC have before they  
 24 joined this lawsuit?

25 A. Five plus an intern right before -- you mean

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1 four weeks in terms of document production, but -- in  
 2 terms of max effort, but it was a moderate hill,  
 3 certainly, right, so...  
 4 Q. (By Mr. Tatum) Can you specify what  
 5 particular activities that fall under the core mission  
 6 of MALC have had to be set aside because of MALC's  
 7 devoted attention to SB 14-related activities?  
 8 A. Ideas aren't one to one. It's a zero sum  
 9 game, largely. But I can say that specifically our  
 10 focus the last four weeks in trying to get these  
 11 documents out and trying to prepare for litigations,  
 12 generally, has prevented us from taking a more -- a  
 13 deeper policy look at this UAC problem on the border. I  
 14 discussed before how voter education efforts have taken  
 15 away from Trey's vision for MALC, which is to have a  
 16 more comprehensive and meaningful Latino policy in all  
 17 sectors.

18 Our goal was to have no issue be  
 19 considered a non-Latino issue. Every issue should have  
 20 a Latino focus or Latino facet to it. And so our policy  
 21 development operation has been relatively sapped because  
 22 of our entry in this lawsuit.

23 We've lost a lot of staff because we  
 24 couldn't afford to pay them because of our voter  
 25 education efforts and our litigations, generally. We

1 like September of 2013. Right?

2 Q. Yes.

3 A. Five.

4 Q. And now you have four?

5 A. Correct. We lost somebody who was deeply  
 6 talented, a tremendous asset. I miss him every day.

7 Q. When you say you left state employment to  
 8 create budgetary space --

9 A. In part.

10 Q. In part.

11 A. Yeah.

12 Q. Does your salary attributable to your work as  
 13 a state employee -- does that come out of MALC's budget?

14 A. No. It comes from -- I'm not a state employee  
 15 anymore, but when I was a state employee, the salary  
 16 came from the state, so...

17 Q. And was it not your testimony that you left or  
 18 you reduced your role with the state to create budgetary  
 19 space for MALC?

20 A. Yes. The Housekeeping Resolution considers  
 21 dual employment -- state employees can serve outside of  
 22 state employment with the permission of the member,  
 23 which includes caucus employment. And the Housekeeping  
 24 Resolution also says you can use caucus equipment -- or  
 25 state equipment for caucus-related activities, as long

1 as -- under certain parameters. So it contemplates dual  
2 employment with a legislative caucus. Right? There was  
3 a time when that wasn't true, but that changed in I  
4 guess '07, I believe.

5 Anyways, my goal was to in part leave  
6 state employment to create space that we could -- you  
7 know, I made about \$4,200 a month from the state, and if  
8 we could somehow shift my salary to Summer, that would  
9 create \$4,000 roughly for MALC to have more money to  
10 make ends meet. Like I said -- and I would appreciate  
11 it if this wasn't publicized, but we have tremendous  
12 budgetary constraints right now because of this effort.

13 Q. You mentioned the chairman's goal or vision  
14 for MALC which he kind of formulated when he came on in  
15 2008?

16 A. Correct.

17 Q. Do you think it's still possible for MALC to  
18 achieve that goal or vision?

19 A. God, I hope so. I really do hope that we can  
20 do that. I hope that we can put this stuff behind us  
21 and reach finality, enjoin this lawsuit, get the Texas  
22 bill done appropriately, because of their actions, and  
23 then focus on the session and try to make things better.  
24 I hope we can do that.

25 Q. Does MALC believe that SB 14 makes it

1 with an impermissible purpose. I think the obvious  
2 choice is that they enacted this lawsuit with a  
3 discriminatory purpose.  
4 Q. Does MALC contend that the legislature  
5 intended to harm any minority group by enacting SB 14?  
6 A. Yes.

7 Q. Has MALC conducted any studies, reports,  
8 audits, estimates, projections or anything like that on  
9 the effect of SB 14 on minority voters or on voters who  
10 are members of a language minority group?

11 MS. RUDD: Objection; compound.

12 A. I think that Representative Anchia did  
13 something like that as a MALC member, and that would  
14 have been given to you guys in our first tranche of  
15 documents. And I think that during the Section 5 trial,  
16 I think we had an expert report -- I think that's true.  
17 But that's the sum total, I think, of our expert  
18 analysis on this point, so...

19 Q. (By Mr. Tatum) Does MALC contend that any  
20 legislator who voted for SB 14 did so with a  
21 discriminatory purpose?

22 A. Yes.

23 Q. Can MALC identify any specific legislators who  
24 voted for SB 14 who did so with a discriminatory  
25 purpose?

1 impossible for MALC to fulfill its goal and mission?

2 A. It's been very difficult. Impossible, I  
3 think is -- I think that's an extraordinary standard,  
4 because there's -- it's been my experience that Summer  
5 Luciano and my boss can do anything, and I mean that  
6 without hyperbole, but -- and the members of MALC are  
7 deeply talented people, and I think the world of their  
8 efforts, all of our members. But it's been my  
9 experience that we can't do what Trey wanted to do  
10 because of this litigation, and that's problematic to  
11 me.

12 Q. Does MALC contend that SB 14 was enacted with  
13 a discriminatory purpose?

14 A. Absolutely.

15 Q. What is that based on?

16 A. Our belief is that the sum of the legislators  
17 who sought the enactment did so with an impermissible  
18 purpose. It's based on our knowledge of legislative  
19 procedure. There were many deviations from normal  
20 procedure in the enactment of the law. There are also  
21 straight comments from people advocating for the law and  
22 straight comments from legislators throughout the course  
23 of it that were -- I think belied an impermissible  
24 purpose. I think that they were -- either the  
25 legislators were completely irrational or they voted

1 A. I think that's a difficult -- more difficult  
2 question, because legislative intent is I think a  
3 multifaceted kind of deal. Arlington Heights talks  
4 about the ways in which you can infer legislative  
5 intent. And I think it's important to know that because  
6 legislative intent includes not only the intent of  
7 legislators but their staffs and maybe their  
8 constituents whom they're advocating on behalf for.  
9 It's a much more deep proposition than a binary is this  
10 person a racist or not.

11 I can't point to anybody who I think did  
12 so impermissibly, but I do believe that they did so  
13 because it's -- either they acted irrationally or they  
14 had an impermissible purpose, which I think is far more  
15 likely.

16 Q. Did any members of MALC vote for SB 14?

17 A. Yes.

18 Q. Do you know which ones?

19 A. Joe Pickett did, I think. I think that Jose  
20 Aliseda did when he was a member. John Garza did.  
21 Larry Gonzalez did. I don't think Aaron Pena did. I  
22 could be wrong, though. He may have, but I don't think  
23 so.

24 Q. Does MALC contend that any of its members who  
25 voted for SB 14 did so with discriminatory intent?

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1 A. I don't know. Like I said, I couldn't point  
 2 to a specific member and how they felt, what they  
 3 felt internally. I just know -- I know there's  
 4 been generally -- Raul Torres I think voted for voter ID  
 5 as well. I know them generally as good people. Larry  
 6 Gonzalez is an exceptional person. He was a great  
 7 staffer. Raul Torres was one of the kindest people I've  
 8 ever met in the Legislature. John Garza is a very nice  
 9 man. I actually hit his car with my car once, and he  
 10 was very kind about it, like super kind. Jose Aliseda  
 11 is super cool. He's a pilot and he has a scuba license,  
 12 which is really neat.

13 Anyways, my point is I know these guys  
 14 personally, and I can't believe that they would, but I  
 15 also don't know what's in their hearts, and I don't  
 16 think it's also the point of legislative intent. It's  
 17 not that they're -- it could be that they're deeply held  
 18 racists and they voted for it because they're racist.  
 19 That's possible. I don't think so. But it's also  
 20 possible that they did so with a still impermissible  
 21 purpose because they were advocating on behalf of  
 22 racists or they sought a racist law because they thought  
 23 it made sense pragmatically. Anyways, I guess what I'm  
 24 saying is I don't know what's in their heart, but it's  
 25 possible, but I doubt it.

1 Q. You mentioned that the -- or you testified  
 2 earlier that the Legislature acted outside of normal  
 3 legislative procedures in enacting SB 14. Is that  
 4 correct?

5 A. Yes, sir.

6 Q. In what ways did the Legislature act outside  
 7 of its normal legislative procedures in enacting SB 14?

8 A. It's a long answer, so I'll have to be fairly  
 9 narrative in this.

10 Q. Just give me specific examples.

11 A. Okay. In 2005, the first bill came up that I  
 12 recall -- it was my first session in the Legislature --  
 13 and it passed the House with some consternation, and  
 14 then it died in the Senate on a two-thirds vote. 12  
 15 Senators or 11 Senators got together saying, "We will  
 16 not vote for this bill," and it died.

17 And then in 2007, a similar bill came up,  
 18 more restrictive. It was the Betty Brown Bill, if I  
 19 recall correctly. And Betty Brown said in committee --  
 20 I think something that I think is at least bigoted,  
 21 possibly prejudicial, maybe racist to Asian-Americans in  
 22 the course of considering this bill. And then that bill  
 23 got passed by the House, and then died in a two-thirds  
 24 vote in the Senate again.

25 In the 2009 session, the Senate changed

1 the rules to have a specific carve-out for voter ID. So  
 2 that's one full change right there. And so it left the  
 3 Senate finally -- there was a Senate bill that came  
 4 over -- and the House members used their procedural  
 5 tactics to kill the bill. That was the chubathon we  
 6 talked about earlier.

7 Fast-forward to 2011, there was a new  
 8 rule dealing with extended debate on the local calendar.  
 9 There was a new rule about -- or the same rule about the  
 10 two-thirds rule. So two deviations from normal  
 11 procedure, and there was a creation of a fast-track  
 12 committee in the House and a committee as a whole in the  
 13 Senate. All of those things are deviations from normal  
 14 procedure for bills like this.

15 I think it would be a deviation from  
 16 normal procedure to not listen to minority advocates. I  
 17 can only look at my time in the leg when I've tried to  
 18 help pass a bill that I thought they were rational  
 19 bills, and when someone -- when my boss presents a bill  
 20 in committee and someone comes up and says, "We don't  
 21 think this bill is a good idea," that bill doesn't go  
 22 anywhere. Right? It gets stymied. It gets absolutely  
 23 stopped until we solve that issue.

24 The legislative process is a process in  
 25 answering objections. And every objection that was --

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1 even small objections were virtually denied and moved  
 2 forward, because the bill had to get passed and passed  
 3 quickly.

4 All those things I think are deviations  
 5 from normal procedure. There are others I could  
 6 probably think of. There is a constitutional problem  
 7 with the bill. The bill was stolen from the Texas  
 8 Mobility Fund to pay for TIC, that way it had a free ID.  
 9 And Trey brought a point of order saying that was  
 10 unconstitutional. That was an A priority jurisdictional  
 11 issue. The bill shouldn't be allowed to move forward  
 12 until it was solved. They went forward anyway, passed  
 13 the bill, and it was solved in conference committee  
 14 through an outside the bounds resolution, which is  
 15 atypical I would say of a deviation from normal  
 16 procedure for a bill of this type.

17 I mean, the one thing I love about the  
 18 Texas Legislature is that there's a lot of bipartisan  
 19 cooperation, and this bill had none of that. And there  
 20 was no listening to minorities or even, you know, just  
 21 rational objections to the bill. That's outside the --  
 22 deviation from normal procedure. And I'm trying to  
 23 think if there's any others I can think of right  
 24 offhand.

25 Q. Let's deal with what you've testified to at

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1 this point.  
 2 A. Sure. Go ahead.  
 3 Q. With regard to the rule changes that you  
 4 mentioned, with regard to the outside the bounds  
 5 resolution, and with regard to any other ways that the  
 6 Legislature deviated from normal procedures as you've  
 7 testified to, is it MALC's position that the Legislature  
 8 acted outside the bounds of its authority in making any  
 9 of these rule changes?

10 A. I think that if it had enacted the bill as  
 11 written in the House version of the bill it would have  
 12 been outside the authority. And it's a small point.  
 13 The Texas Mobility Fund says you can't rob from it  
 14 unless you ruin the full faith and credit of -- it's a  
 15 Texas Constitutional dictate. Arguably the Legislature  
 16 can't pass something that's unconstitutional, arguably,  
 17 and so in that sense it's possible that that was outside  
 18 the authority.

19 Other than that, the legislative  
 20 authority is prescribed by the House rules, so anything  
 21 that was outside of the rules I think was probably  
 22 outside the authority of the House. But I have a  
 23 restrictive view of the rules, frankly. And the Texas  
 24 Constitution outlines what the authority and the duty of  
 25 the House is.

1 I don't think that the bill violated the  
 2 presentment clause, if that's what you're asking, so...

3 Q. It's part of what I'm asking.

4 A. Yes, sir.

5 Q. So, for instance, take the rule changes with  
 6 regards to the two-thirds vote that you testified  
 7 earlier to. Correct?

8 A. Yes, sir.

9 Q. Was that rule change duly made by the  
 10 Legislature?

11 A. By the Senate, yes, sir.

12 Q. Have rule changes like that happened before?  
 13 A. Yes. I think there was a carve-out for  
 14 redistricting in the '90s that got kind of grandfathered  
 15 in, I believe, but it's rare. And certainly a deviation  
 16 from normal procedure.

17 Q. Have members of MALC ever employed similar  
 18 procedures to assist in pushing any of their bills  
 19 through the House?

20 A. Specific to a Senatorial carve-out, I don't  
 21 think so.

22 Q. Well, not Senatorial carve-outs for House  
 23 bills, but --

24 A. Right. Right.

25 Q. Have members of MALC ever employed similar

1 procedures that the Senate employed with regard to SB 14  
 2 in pushing any of their bills through the House?  
 3 A. So I just want to make sure I understand the  
 4 question.

5 Q. Sure.

6 A. This is actually -- this is what I do for a  
 7 living, so I'm picayune about certain things. There are  
 8 provisions in the House rules to have a committee as a  
 9 whole -- it's very rare. MALC has never done that to  
 10 pass a bill.

11 There is something called a special order  
 12 under Rule 8 where you can, under certain parameters, do  
 13 a special order to bring a bill out of calendars, bring  
 14 a bill out of committee. I can't recall if that's ever  
 15 happened. I think Chairman Gallego did a special order  
 16 on a Betty Brown Bill in 2007, if I recall correctly.  
 17 That was a bill that died on local calendar but had been  
 18 brought up by order to pass it essentially in the spirit  
 19 of comity. But I think that's substantially different  
 20 than -- that's a specific rule provision. There's no  
 21 carve-out for the rules, no back door for any MALC  
 22 member policy, I don't think.

23 Q. So does MALC believe that any of the  
 24 Legislature's alleged deviations from normal  
 25 procedures -- does MALC contend that any of those

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1 deviations were made illegally?

2 A. And by "illegal," you mean outside the bounds  
 3 of the Texas Constitution?

4 Q. In violation of the Texas Constitution or any  
 5 statute or any rule governing the Legislature.

6 A. I'm trying to think. If I recall correctly --  
 7 and this may not have been the voter ID bill, but there  
 8 was a bill that had a formal meeting, which was -- it's  
 9 a public meeting, but it's just -- you don't consider  
 10 public testimony, and it's basically used to vote out  
 11 bills. And there was a time in which it was used that  
 12 was at 10:00 p.m., it was on the House floor and the  
 13 House had shut down, so people couldn't go to the public  
 14 meeting -- and it may have been on this bill -- maybe it  
 15 wasn't. Maybe it was on the redistricting bill.

16 Anyways, that is an insipit violation of the House  
 17 rules. Right? But is it an actual violation? I doubt  
 18 it.

19 I guess when you say "illegal" --  
 20 deviations from normal procedure don't imply illegality  
 21 to me. There are deviations from the way things  
 22 normally go. And big bills have a certain prescribed  
 23 kind of trope by which they go through, and this bill  
 24 didn't do that. This bill hit the gas pedal from the  
 25 very beginning and was in and out of the House very

	<p>98</p> <p>1 quickly. It came over from the Senate before we had 2 even formed committees. That's how quick it got here. 3 And it was done that -- that was done so that there 4 could be no procedural tactics to delay the bill in 5 trying to prevent its passage. I mean, that's obvious.</p> <p>6 Q. Is your contention that those deviations -- 7 let me retract that.</p> <p>8 Did MALC as an organization oppose SB 14?</p> <p>9 A. I think so. And by -- I don't mean to -- I 10 don't mean to kind of be wishy-washy about it. I think 11 that we had a public statement about it. I think Trey 12 had public statements about it. So I think as an 13 organization we were against it, which was rare, by the 14 way, to say we're against a bill. So I think we did 15 based on my recollection, but I'm not exactly 100 16 percent certain that we had one, so...</p> <p>17 Q. Did MALC as an organization provide testimony 18 during the consideration of SB 14?</p> <p>19 A. Members can't provide testimony. When MALC 20 has offered testimony it's been through Mr. Garza, and 21 Mr. Garza at that time, in 2011, was not hired to advise 22 us on voter ID.</p> <p>23 Q. So what was Mr. Garza's capacity with MALC in 24 2011?</p> <p>25 A. He had been hired for redistricting counsel,</p>		100
	<p>99</p> <p>1 so...</p> <p>2 Q. Did MALC provide written talking points to its 3 members or staff regarding SB 14 during its 4 consideration in the legislature?</p> <p>5 A. For some members, I believe so. I think that 6 the informal process as you formulate amendments and 7 write talking points for those amendments for members, 8 and then they kind of get distributed in certain ways. 9 It's been three years now, so I can't remember whom 10 besides my boss did I write talking points for, but I'm 11 sure that I did. I'm sure that we did help many members 12 with their amendments, but I can't recall the actual 13 specifics. So generally, yes, but specifically I'm not 14 sure.</p> <p>15 Q. Would it have been your job to draft those 16 talking points?</p> <p>17 A. In part. Me and Manny.</p> <p>18 Q. But you don't recall drafting any specific 19 ones?</p> <p>20 A. I did. I certainly drafted some for Trey. 21 That's certainly true. Whether or not he gave an 22 amendment to someone on the floor with my talking 23 points, I can't remember, so...</p> <p>24 Q. Do you know if those documents containing 25 those talking points have been produced in this</p>		101

<p>1 status conference, which I can only assume means some 2 kind of regular meeting to discuss voter ID bills. 3 A. It is possible that there was a MALC meeting. 4 2011, again, was three years ago. I'm trying to 5 remember. We had two or three or four MALC meetings, 6 some of which were related, one of which may have been 7 voter ID related -- one. But I don't recall specifics. 8 A status conference, to me, sounds like a 9 conference with the Court, frankly, and I don't think 10 that's -- I don't recall talking to our members about 11 that, you know, so... 12 Q. Did MALC draft or propose or research or 13 request any amendments to SB 14 while it was being 14 considered? 15 A. Surely. 16 Q. Who would be in charge of drafting such 17 amendments? 18 A. TLC. I'd call them up and say, "I would like 19 these amendments for my boss or for my caucus." 20 Q. And how would MALC decide on what amendments 21 it wanted to make? 22 A. You know, it's a really informal process, 23 generally, because you're very time-constrained, and 24 there were significant time constraints with this bill. 25 And so you kind of go back to what you used to do and</p>	<p>102</p> <p>1 member who proposed a bill proposed something or voted 2 for something, and there was lots of amendments we think 3 would ameliorate -- you look back in hindsight, could I 4 have done a different amendment that would make a better 5 argument. I could probably think of several that I 6 would want to do now. But at the time, I think I 7 remember being satisfied that we had fought a good 8 fight, so... 9 Q. Do any members of MALC believe that they were 10 not given ample opportunity -- sorry. Let me back up. 11 Do any members of MALC who opposed SB 14 12 believe that they were not given ample opportunity to 13 voice their opposition to the bill while it was being 14 considered? 15 A. I think that's probably true in the sense that 16 the committee hearing itself lasted -- I think it was 20 17 hours. It was kind of a marathon committee hearing, 18 which is not always the case, but sometimes the case. 19 And it was a real perfunctory meeting in the sense that 20 it was like witness, witness, witness. It was just kind 21 of going through the motions. 22 Rolando Gutierrez is a close friend of 23 mine and a close friend of the representatives was on 24 that committee, and he described it as a sham process. 25 And so in that sense, I think that no amount of time</p>
<p>103</p> <p>1 try to think about it. You brainstorm a little bit. 2 And if you get any idea on a bill like this, you kind of 3 throw it into TLC to have them draft it so you can get a 4 picture of it. Because your bosses won't respond until 5 they can read it, honestly. That's how legislators 6 work. And so you just overdraft, draft as many as you 7 could, and see if you can't get authors for them, your 8 boss or have your boss do it. 9 And so informally is the answer to your 10 question. 11 Q. So is that process of proposing amendments -- 12 is that typically a pretty rushed procedure or pretty 13 fast-paced procedure? 14 A. Largely, especially on this bill. We had to 15 reset with this bill, because I think Armando Martinez 16 appointed it on a Rule 4, Section 32(c). So there was, 17 like, a two-day reset. So there was some lag time where 18 you can kind of catch your breath between the two days, 19 but there was still a lot of time, and there was a lot 20 of pressure to pass the bill, a lot of pressure to 21 defeat the bill, you know. 22 Q. Did MALC feel like it was able to present all 23 the amendments that it wanted to with regard to SB 14? 24 A. You know, I can't speak specifically to each 25 MALC member, but I think that every -- almost every MALC</p>	<p>105</p> <p>1 that was allotted could have, you know, represented the 2 complete opposition of the bill. So the answer to your 3 question is probably yes, so... 4 Q. Did MALC as an organization undertake any 5 efforts to prevent SB 14 from being passed? 6 A. Yes. 7 Q. And what were those efforts? 8 A. Questions of order, trying to get people to 9 vote no, forming coalitions with other legislators to 10 try to get them to vote no, trying to get people to 11 voice their opposition, you know, getting quality 12 testimony to try to, you know, figure that out. 13 Q. Did MALC employ tactics that were meant to 14 slow down or delay consideration of the bill? 15 A. During which session? 16 Q. 2011. 17 A. I'm sorry. 18 Q. All these questions I'm asking you right now 19 are within the timeframe of the 2011 Legislature during 20 which SB 14 was being considered. 21 A. I don't think that they had those options 22 available to them in 2011 because of the rule change, 23 and the -- I mean, Representative Martinez -- Mando 24 Martinez pointed the bill, so in that sense that delayed 25 it for I think 48 hours, roughly. So in a sense,</p>

<p>1 literally the answer is yes, but I don't know -- the  2 same panoply of tactical options was not available to  3 MALC members in 2011 that were available for them in  4 2009. So generally the answer would be no.</p> <p>5 Q. Did MALC use all tactics at its disposal to  6 delay or defeat SB 14?</p> <p>7 A. No. I mean, quorum-busting is always an  8 option. In 2011, probably not. But you could have  9 tried to do it. You could have had an informal or  10 formal quorum bust, and that would delay the passage of  11 all bills theoretically. I don't think it was a real  12 tactical option at the time because of the time in  13 session in which the bill had come up. But we didn't do  14 everything we could have done. Theoretically, we could  15 have had a suicidal quorum bust, but --</p> <p>16 MR. TATUM: How are we doing?</p> <p>17 THE WITNESS: I'm square. Mr. Whitley?</p> <p>18 MR. WHITLEY: Oh, I'm fine.</p> <p>19 Q. (By Mr. Tatum) Do you recall Senate Bill 362  20 proposed during the 2009 Legislature?</p> <p>21 A. Mr. Fraser, yes, I remember the bill.</p> <p>22 Q. What was that bill about?</p> <p>23 A. It was a voter identification bill.</p> <p>24 Q. Did MALC oppose that bill?</p> <p>25 A. I believe so. Members of MALC certainly did.</p>	<p>106</p> <p>1 Q. It's quite descriptive.  2 A. Yeah.  3 Q. Do you know if MALC expended more or less  4 resources opposing SB 362 than it did opposing SB 14?</p> <p>5 A. Less, because SB 14 has extenuated for years  6 now. Right? 362 was limited just to the session.  7 SB 14 has been an ongoing problem since 2011.</p> <p>8 Q. Does MALC support the idea that only  9 registered voters should be allowed to vote?</p> <p>10 A. I think so. And I don't mean to equivocate.  11 I think there's a reason -- I think registration --  12 there's been several bills that have been filed by MALC  13 members I think over the years to reconsider how we  14 register voters. So generally, yes, but specifically  15 they eat away at what registration actually means. So I  16 don't mean to be picayune. I just want to be clear.  17 Q. So does MALC believe that a nonregistered  18 voter should be allowed to vote?</p> <p>19 A. No, I don't think so. But again, the notion  20 of registration itself is something that's open to  21 legislative amendment and change. Right? There are  22 some MALC members who wanted to get rid of -- I think  23 that there may be some MALC members who would be willing  24 to get rid of registration if it -- and use some other  25 form of proving up whether this person should be allowed</p>
<p>107</p> <p>1 I don't remember if MALC itself had a statement at the  2 time in 2009, but most members did oppose the bill.</p> <p>3 Q. I'm sorry. You don't believe that MALC had a  4 statement?</p> <p>5 A. You said when MALC had a -- had a public  6 statement saying, "We oppose SB 362." I can't recall if  7 we had done that then, but most members opposed that  8 bill.</p> <p>9 Q. Did MALC engage in the same kind of tactical  10 efforts during the consideration of SB 362 that it did  11 with regard to SB 14?</p> <p>12 A. SB 362 never reached the House floor because  13 of the chubathon, so it wasn't the same tactical  14 efforts. We didn't have amendments to SB 362. We  15 didn't have points of order or questions. It was just  16 delayed from consideration because of the extenuation of  17 the local calendar.</p> <p>18 Q. So it didn't have to engage in the same kind  19 of activities with regard to SB 362 that it did with  20 SB 14 because it successfully defeated the bill through  21 the chubathon?</p> <p>22 A. Correct.</p> <p>23 Q. Is that what it's called, the chubathon?</p> <p>24 A. Lots of people have different words for it. I  25 think that's the most descriptive, so...</p>	<p>109</p> <p>1 to vote. That may be an idea that could kind of get  2 some hold among MALC members, but I would say that  3 MALC's position is we support voter registration,  4 generally. And there may be better ways to do  5 registration, too. Right? You could do it online. You  6 could do it lots of different ways. Which kind of  7 changes the question a little bit, but I know what  8 you're saying, so...</p> <p>9 Q. Let's just frame it this way. Under the  10 current statutory scheme regarding voter registration,  11 does MALC believe that only registered voters should be  12 allowed to vote?</p> <p>13 A. We should follow the law as it stands.</p> <p>14 Q. Does MALC believe that Texas should make sure  15 that people attempting to vote are registered voters?</p> <p>16 A. Yes.</p> <p>17 Q. Does MALC believe that Texas should make sure  18 that people do not vote or attempt to vote in the name  19 of another person?</p> <p>20 A. Yes.</p> <p>21 Q. Does MALC acknowledge that voter fraud exists?</p> <p>22 A. Voter fraud generally?</p> <p>23 Q. Yes.</p> <p>24 A. Yes.</p> <p>25 Q. Does MALC acknowledge that voter fraud exists</p>

<p>1 in Texas?</p> <p>2 A. Yes.</p> <p>3 Q. Has any member of MALC ever communicated any 4 allegation or concern to MALC relating to voter fraud?</p> <p>5 A. To MALC? I'm trying to think. Representative 6 Pena and Representative Aliseda talked about voter fraud 7 a great deal in 2011. They may have made -- they never 8 sent us a letter or anything. I don't know if they 9 talked to Trey about it. But I'm aware of those MALC 10 member concerns about voter fraud. And Representative 11 Pena was deeply concerned about mail-in ballot fraud 12 specifically, and I think that's a real problem is 13 mail-in ballot fraud.</p> <p>14 Q. When --</p> <p>15 A. One --</p> <p>16 Q. Sorry.</p> <p>17 A. I'm sorry. One not solved by SB 14, 18 incidentally, so...</p> <p>19 Q. Did any of those members express any concerns 20 related to in-person voter fraud?</p> <p>21 A. I think Jose Aliseda may have. He and my boss 22 had an interview in which they talked about SB 14 for 23 the -- I believe it was the Tribune at the time, and he 24 may have communicated those concerns, certainly in the 25 interview and elsewhere, so...</p>	<p>110</p> <p>1 it's broad enough to incorporate things that are outside 2 of the realm of in-person voter fraud.</p> <p>3 THE WITNESS: It would have to be 4 because --</p> <p>5 MS. RUDD: So it's Exhibit 1.</p> <p>6 A. Okay.</p> <p>7 Q. (By Mr. Tatum) It's on Page 5 there. Please 8 take a minute and review the terms "election crimes" and 9 "voter fraud."</p> <p>10 A. That's how I understood it. I mean, that's a 11 general term. That is not just in-person voter 12 impersonation. That includes mail-in ballot fraud, 13 other kinds of more prevalent -- possible electronic 14 fraud that was included in that. That's a broader 15 category than just in-person voter fraud.</p> <p>16 Q. Okay. So I'll ask again: Has any member of 17 MALC ever communicated any allegation or concern to MALC 18 related to voter fraud?</p> <p>19 A. Surely. I'm trying to think. Aaron Pena 20 talked about mail-in ballot fraud a great deal, and he 21 was on the elections committee. I think other people 22 have talked about the changes we made to voter 23 registration in 2011 and how that has caused certain of 24 their constituents to be in trouble. I can't remember 25 the names of the constituents or the member, but I know</p>
<p>1 Q. And what were those concerns?</p> <p>2 A. I think he believed that in-person 3 impersonation was a larger problem than it actually was. 4 He may have said that if I recall correctly. Again, 5 it's been three years, and it was a stray interview that 6 I barely recall, but --</p> <p>7 Q. Has any member of MALC ever communicated any 8 allegation or concern to MALC relating to election 9 crimes?</p> <p>10 A. Surely.</p> <p>11 Q. Can you identify any member of MALC who has 12 communicated an allegation or concern related to 13 election crimes?</p> <p>14 MS. RUDD: Just let me -- I want to 15 clarify just for the record, Stephen, that when you 16 refer to voter fraud and election crimes, you're 17 referring to those notions as defined in your notice of 18 deposition. Is that correct?</p> <p>19 MR. TATUM: That's correct.</p> <p>20 MR. RUDD: Okay.</p> <p>21 A. Does that include other crimes other than 22 in-person voter --</p> <p>23 Q. (By Mr. Tatum) If you would like to take a 24 minute and review the definitions.</p> <p>25 MS. RUDD: I would say yes. I would say</p>	<p>111</p> <p>1 that I remember them talking about that</p> <p>2 I have personal knowledge in my past days 3 as an election lawyer about certain election crimes in 4 the cases that I've been involved in -- or what I 5 thought were election crimes at the time. So, yes, 6 generally.</p> <p>7 Q. Do you have any experience in your time as an 8 election lawyer with in-person voter fraud?</p> <p>9 A. None.</p> <p>10 Q. None whatsoever?</p> <p>11 A. None whatsoever. It's all been voter fraud in 12 the sense that mail-in ballot fraud or alleged massive 13 internal electronic corruption from one of the election 14 officials themselves.</p> <p>15 Q. Has any member of MALC ever communicated any 16 allegation or concern to MALC relating to in-person 17 voter fraud?</p> <p>18 A. Other than Mr. Aliseda?</p> <p>19 Q. Yes.</p> <p>20 A. I don't believe so.</p> <p>21 Q. Is it true that MALC has never conducted any 22 calculation, report, audit, estimate, projection, or 23 other analysis relating to voter fraud?</p> <p>24 MS. RUDD: Objection; compound, vague.</p> <p>25 Q. (By Mr. Tatum) And just for reference, I'm</p>

	<p>1 referring to MALC's objections to the rule 30(b)(6)  2 notice, and this question is based on those objections.  3 A. Okay.  4 Q. Specifically to topics, I believe, 25 and 26.  5 A. I'm trying to think. Could you say it again?  6 Q. Sure.  7 A. I lost it.  8 Q. Sure. Is it true that MALC has never  9 conducted any calculation, report, audit, estimate,  10 projection, or other analyses relating to voter fraud?  11 MS. RUDD: Same objection.  12 A. I don't think that's true. I think that  13 Trey -- there was a time in which during the Section 5  14 trial Mr. Rosenberg questioned the -- the -- or  15 Mr. Forest, I think is his name. He's a Texas Ranger,  16 inspector for y'all -- about voter fraud in person, and  17 he went through the -- I guess the five known cases of  18 in-person voter impersonation and went through how there  19 were indictments for several of them and how SB 14 may  20 not have been able to prevent those things. So in that  21 sense -- and Trey has repeated that line and repeated  22 that analysis. So now, since we've done a -- a surface  23 analysis of in-person voter fraud from the trial -- so  24 that's my answer, I think.  25 Q. (By Mr. Tatum) Has MALC ever commissioned or</p>
	<p>1 impersonation and how much was election worker error or  2 malfeasance, how much was mail-in ballot fraud, how much  3 was just crazy people, you know, so...  4 Q. Does MALC believe that voter fraud should be  5 illegal?  6 A. Yes.  7 Q. Do you think -- does MALC believe that SB 14  8 deters voter fraud?  9 A. No.  10 Q. Why not?  11 A. In-person voter impersonation is so rare that  12 in the known cases that we know about, I think SB 14  13 would have prevented only one of them.  14 And so if you go back to the cases and  15 the number of votes over time that -- so in 2010 and  16 2012, there were something like 13 million votes cast in  17 various elections. Right? And over that same time  18 period, there was only four known voter impersonation  19 attempts and only -- I think only one indictment, I  20 think. I may be getting the numbers slightly wrong.  21 And in that one, I think it was a father voting for his  22 son in Fort Worth. And they had the same name, and I'm  23 not sure the ID would have caught that unless the  24 election worker looked at the date of birth, which maybe  25 they wouldn't have -- anyway, my point is that if SB 14</p> <p>115</p> <p>1 was targeted at that kind of crime, rare though it was,  2 in that one instance when it may have mattered, it may  3 not have mattered. It may not have been able to prevent  4 that. So in that sense, that justification is totally  5 irrational to me.  6 Q. Does MALC believe that SB 14 would prevent  7 someone from casting the vote of someone else?  8 MS. RUDD: Objection; vague.  9 A. Generally, it's possible. I think it's  10 unlikely.  11 Q. (By Mr. Tatum) Why is it unlikely?  12 A. Most people who vote in person are voting for  13 their dead dad or that they're crazy. It happened in  14 Bexar County once. This woman had, like, 13 forms of  15 ID, all with different names, and she tried to vote with  16 some of those. She had no mens rea. Right? You  17 couldn't indict her for that, because she was just  18 crazy. Right? And the known examples of in-person  19 voter impersonation that we're aware of, I don't think  20 SB 14 would have -- may not have prevented any of them.  21 So in that sense, empirically, it's not likely.  22 I also think that it's much more likely  23 to disenfranchise people far more quickly and horribly  24 than it is to prevent someone from illegally voting.  25 Q. Has any member or constituent of MALC -- let</p> <p>117</p>

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<p>1 me say: Has any member or constituent of a member of 2 MALC ever expressed support for voter ID laws? 3 A. Surely. Mr. Pickett voted for it, I believe. 4 Mr. Aliseda voted for it. Mr. Gonzalez and Mr. Torres 5 and Mr. Garza did. I can't remember if Mr. Pena did or 6 not. I don't think that he did. I think he had -- I 7 think he remained consistent with his previous position. 8 Q. Has MALC as an organization ever supported a 9 voter ID bill? 10 A. I'm trying to think. I don't think so. There 11 may have been some members who might seek a compromise 12 that would in that sense be a voter ID bill. I think 13 that there are certain versions of a voter ID that MALC 14 could support or at least acquiesce to. No version of 15 that has ever gone to the House floor, so... 16 Q. Would MALC ever support a bill requiring a 17 photo ID to vote? 18 A. Certainly. 19 MS. RUDD: Objection; calls for 20 speculation. 21 THE WITNESS: I apologize. I didn't mean 22 to overstep. 23 A. But certainly I think we could absolutely 24 consider it if it had -- if we didn't believe it 25 disfranchised people, and if we thought it had</p>		<p>1 government-issued photo ID before they can be allowed to 2 vote? 3 A. That's what it says here on this exhibit. I 4 think that I recall a poll -- references to the poll 5 during the debate. So I think that's right. 6 Q. Okay. Well, I represent to you that this is a 7 graphical depiction of the results of that poll that can 8 be found online. 9 (Exhibit No. 4 marked) 10 Q. (By Mr. Tatum) I'm handing you what's been 11 marked as Exhibit 4. 12 A. Thank you, sir. 13 Q. I'll represent to you this is another 14 graphical depiction of the results of that poll, this 15 one broken down by political party. Could you tell me, 16 looking on the left of this poll, please, what 17 percentage of Democrats agreed with the proposition that 18 voters should be required to present a government-issued 19 photo ID before they can be allowed to vote? 20 MS. RUDD: I'm just going to object to 21 the question to the extent that it characterizes this 22 poll as representing what Democrats believe generally. 23 But you're welcome to interpret this graph to the extent 24 you can. 25 A. It says 58 percent on your graph.</p>	
<p>1 sufficient protections for people who were harmed, I 2 think it's something that every member could think about 3 getting behind. 4 It is unlikely given the current climate 5 of I think deeply racist beliefs, but we'll -- you know, 6 I remain hopeful that we can reach some sort of accord. 7 Q. (By Mr. Tatum) Does MALC believe that voter 8 ID requirements were not popular amongst Texans when 9 SB 14 was being considered in 2011? 10 A. They were enormously popular, as was slavery 11 back in 1860, so... 12 Q. Does MALC equate SB 14 with slavery? 13 A. No. I'm just saying that sometimes popular 14 ideas aren't great ideas. 15 MR. TATUM: I have a few more questions 16 and then we can break for lunch. 17 MS. RUDD: Perfect. 18 (Exhibit No. 3 marked) 19 Q. (By Mr. Tatum) Mr. Golando, I'm handing you 20 what's been marked as Exhibit 3. 21 Are you aware that according to a poll 22 conducted by the Texas Tribune and University of Texas 23 in February 2011, while SB 14 was being considered, that 24 75 percent of registered voters agreed with the 25 proposition that voters should have to present a</p>	119	<p>1 Q. (By Mr. Tatum) Can you tell me what 2 percentage of Independents agreed with that proposition? 3 MS. RUDD: Same objection. 4 A. 70 percent. 5 Q. (By Mr. Tatum) So would you agree that 6 according to the results depicted by this graph, that a 7 majority of Democrats and Independents supported voter 8 ID requirements in 2011? 9 A. Again, I have certain caveats, because I'm a 10 social sciences person. I haven't read the poll. I 11 don't know how they conducted it. But with those 12 caveats, what you've graphically represented to me is 13 representative of that notion, sure. 14 (Exhibit No. 5 marked) 15 Q. (By Mr. Tatum) I'm handing you what's been 16 marked as Exhibit 5. Mr. Golando, I represent to you 17 that this is another graphical depiction of the Texas 18 Tribune and University of Texas poll that I referenced 19 earlier. 20 Could you tell me by looking at this 21 graph what percentage of African-Americans agree with 22 the proposition that registered voters should be 23 required to present a government-issued photo ID before 24 they can be allowed to vote? 25 MS. RUDD: Again, objection, calls for</p>	121

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1 speculation. To the extent you want to testify about  
2 what the graph contains, that's perfectly fine.  
3 A. I think it's 63 percent; although, the  
4 gradation between the green is kind of difficult for me  
5 to determine, frankly, but I think it's 63 percent.  
6 Q. (By Mr. Tatum) I can relate. I'm kind of  
7 color blind myself. But we're looking at the middle  
8 column.  
9 A. Oh, the middle column. I see. Okay.  
10 Q. Okay. Looking at the right-hand column of  
11 that left grouping, can you tell me what percentage of  
12 Latino registered voters agreed with the proposition --  
13 or sorry -- what percentage of Latino respondents to the  
14 poll agreed with the proposition that registered voters  
15 should be required to present a government-issued photo  
16 ID before they can be allowed to vote?  
17 A. Latinos?  
18 Q. Yes.  
19 A. And when you say "agree," you mean this  
20 grouping right here? I just want to make sure we're --  
21 Q. Correct.  
22 A. 68 percent according to your graphical  
23 representation of the people responding.  
24 Q. So 68 percent of Latinos who responded to this  
25 poll agreed with the proposition. Is that correct?

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1 A. That's what your -- if that's accurately  
2 represented in this graph, I can agree to that, so...  
3 Q. Okay. So based on the information that's in  
4 this graph, would you agree that the graph depicts that  
5 a majority of African-Americans and Latinos who  
6 responded to the poll supported voter ID requirements in  
7 2011?  
8 A. I guess, such that it is. I mean, again, with  
9 many caveats, but such that it is.  
10 Q. Does MALC believe that members of the Texas  
11 Legislature have a duty to represent the interests of  
12 their constituents?  
13 A. Absolutely.  
14 Q. Okay. Assuming that the data in these polls  
15 is accurate, do you think it's possible, then, that  
16 SB 14 was enacted according to the wishes of Texas  
17 citizens rather than some discriminatory or racist  
18 intent held by the legislators that enacted it?  
19 MS. RUDD: Objection; compound, calls for  
20 speculation, form.  
21 A. I think it's unlikely that that's true.  
22 Q. (By Mr. Tatum) But do you think it's  
23 possible?  
24 MS. RUDD: Same objection.  
25 A. Again, I would say anything is possible, but I

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1 think that my knowledge of Legislative procedure and of  
2 legislators generally, when people have a shifting  
3 justification for their bill and when they deviate from  
4 normal procedure and try everything they can do to pass  
5 a bill over the strong objections and advocates and  
6 leaders in the minority community, that's usually  
7 because they can't see the purpose behind what they're  
8 doing, and it's usually an impermissible purpose. So  
9 it's very unlikely, but yet possible.  
10 (Exhibit No. 6 marked)  
11 Q. (By Mr. Tatum) I'm handing you what's been  
12 marked as Exhibit 6. Mr. Golando, I'll represent to you  
13 that these are the results of a similar poll also  
14 conducted by the Texas Tribune and the University of  
15 Texas, but this time conducted in October of 2012.  
16 Now, if you would, please look at this in  
17 conjunction with Exhibit 5 that I just handed you.  
18 Okay. So looking at Exhibit 5, we  
19 established earlier that 68 -- in 2011, 68 percent of  
20 Latinos agreed with the proposition that registered  
21 voters should be required to present a government-issued  
22 photo ID before they can be allowed to vote. Is that  
23 correct?  
24 MS. RUDD: According to this poll.  
25 MR. TATUM: Correct.

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1 A. Yes, sir.  
2 Q. (By Mr. Tatum) Okay. Looking at Exhibit 6,  
3 again conducted in 2012, can you tell me what percentage  
4 of Hispanic respondents to this poll agreed with the  
5 proposition that registered voters should be required to  
6 present a government-issued photo ID at the polls before  
7 they can be allowed to vote?  
8 A. The graph says 75 percent.  
9 Q. Okay. So would you agree that between the  
10 2011 poll and the October 2012 poll, the percentage of  
11 Latino or Hispanic respondents who responded to this  
12 poll and who agreed with the proposition increased from  
13 68 percent to 75 percent?  
14 A. I think that's true; although, I would say  
15 that margins of error for subgroupings of demographic  
16 groups in polling depends largely on the number of  
17 people polled. I don't know if that's a blip that's  
18 within in the margin of error or not, but, yes, if  
19 that's -- all factors being equal, that could be true.  
20 Q. Okay. Assuming that margins of error have  
21 been accounted for and every other possible anomaly or  
22 variable has been controlled for with these polls, do  
23 you think -- can you explain why the percentage of  
24 respondents who agreed with this proposition --  
25 percentage of Hispanic or Latino respondents who agree

1 with this proposition, can you explain why that 2 percentage increased between February 2011 and October 3 2012? 4 MS. RUDD: Objection; calls for 5 speculation. 6 A. I think that it could be statistical noise 7 within the poll instrument itself. That's certainly a 8 possibility, that it's within the blip. Margin of error 9 can be more than 3.5 percent on either side. It can be 10 far greater. So that's one possibility. 11 Another possibility is that there's been 12 a small incremental shift in Latino opinion about voter 13 ID, at least in response to this poll over that time 14 period. And I guess over that time period, that would 15 include the 2012 elections, at least the primaries. 16 This was October 2012. Right? And so there had been 17 lots of publicizing of voter ID problems throughout the 18 nation, and maybe Latinos didn't -- the Latinos who were 19 polled didn't think it was a problem. I don't know. 20 It's possible that the people who 21 answered their phone for polling firms are 22 representatives of Latinos generally, or that these two 23 universes of people who are responding to these polls 24 are substantially different. 25 Also, the way in which you ask the	126 1 or the people that they represent? 2 Q. The people that they represent. 3 A. Absolutely. 4 Q. Okay. Do you know how many constituents of 5 the members of MALC lack any of the acceptable forms of 6 ID under SB 14? 7 A. I recall from the Section 5 trial that there 8 was a number that was deeply contested. The State had 9 proffered some evidence that as many as 795,000 might 10 not have access that's based off registration rules, 11 people that didn't have driver's license, didn't 12 register with Social Security cards. And so I think 13 that was 795, and I think that our expert -- or the 14 DOJ's expert at trial in Section 5 came up with as many 15 as 1.8 million that didn't match the databases that he 16 had access to. 17 And then Dr. Shaw did a poll of that 18 universe and got a -- it was a very poor poll. There 19 was a very low response rate. But he determined that 20 some portion -- I think it was like 10 or 20 percent of 21 the 1.8 million would be affected. And so I would say a 22 range of somewhere between 200,000 to 1.8 million Texans 23 might be affected and some portion of Texas MALC 24 members -- probably a higher portion than other members 25 of the state. Because MALC members range from --
1 question, the polling instrument itself, the order of 2 the questioning determines certain blips. It's 3 certainly possible, all those things could be possible, 4 so... 5 MR. TATUM: That's all I have right now. 6 Would y'all like to take a break? It's ten after 12:00. 7 MS. RUDD: Yeah. That's great. 8 (Recess from 12:13 p.m. to 1:19 p.m.) 9 Q. (By Mr. Tatum) Okay. Mr. Golando, you stated 10 earlier that MALC believes that SB 14 denies or abridges 11 the right to vote of constituents of MALC members. Is 12 that correct? 13 A. Yes, sir. 14 Q. Does MALC contend that a significant portion 15 of its constituency -- by that, I mean the constituency 16 of its members -- lack any of the acceptable forms of ID 17 under SB 14? 18 MS. RUDD: Objection; vague. 19 A. What do you mean by "significant"?	127 1 they're from all over. And we have a lot of the 2 counties and a lot of the population. 3 Q. Is MALC able to identify one constituent of a 4 member of MALC that does not have any of the acceptable 5 forms of ID under SB 14? 6 A. The intervenors that are represented by 7 Mr. Garza, several of them are affected people. I 8 believe that some of them are from Nueces County, and I 9 think they're represented by Able Herrero if I 10 recall correctly. 11 Q. And is Mr. Guerrero a member of MALC? 12 A. Mr. Herrero? Yes. 13 Q. Whoever you just -- 14 A. I'm sorry. Yeah, Mr. Herrero is a member of 15 MALC. 16 Q. Okay. 17 A. He's former vice chairman. He's current 18 chairman of the Criminal Justice Committee in the House. 19 Q. Is MALC able to identify any constituents of 20 its members who do not have a driver's license? 21 A. Undoubtedly they do, but I can't give you a 22 list of names of people without a TXDL. 23 Q. Is MALC able to identify any constituents of 24 its members who do not have a state-issued photo ID? 25 A. Again, undoubtedly they do because of the --

1 what we know about the ID rates among Latinos, 2 African-Americans, and the indigent, but I can't give 3 you specific names. 4 Q. Is MALC able to identify any constituents of 5 its members who do not have a concealed handgun license? 6 A. That's a much smaller universe of people. I 7 think there must be -- I think there's 18,000 people in 8 the CHL database, I think. There may be more than that. 9 I may be off by an order of magnitude, but I can't give 10 you a specific name of people who don't have a CHL; 11 although, large portions of MALC members probably -- 12 constituents don't have a CHL. It's a very small 13 universe of people. 14 Q. Is MALC able to identify any constituents of 15 its members who do not have a U.S. passport? 16 A. No, I'm not privy to that information. 17 Q. Is MALC able to identify any constituents of 18 its members who do not have a military ID card with a 19 photo? 20 A. I'm not privy. 21 Q. When you say you're not privy to that 22 information -- 23 A. I don't know. I don't know. 24 Q. Is MALC able to identify any constituents of 25 its members who do not have a citizenship certificate?	130 1 EIC? 2 A. Any of its members or -- 3 Q. Sorry. Is MALC able to identify any 4 constituents of its members who do not have any of the 5 documents necessary to get an EIC? 6 A. I think some of the intervenors that are 7 represented by Mr. Garza don't have the documents 8 necessary to get an EIC. I think that's correct. 9 Q. Can you identify one of them? 10 A. You know, I don't know them by name. I'm 11 sorry. I know that there's a man in Nueces County -- or 12 maybe it was actually -- it was Hidalgo County. That's 13 where it was, Hidalgo County -- who can't get a birth 14 certificate because he was born, I think, by a midwife. 15 It was very hard for him to get an actual birth 16 certificate. And that was the only kind of document he 17 could get to go get an EIC. I think that's correct, 18 so... 19 Q. Do you know how many constituents of your 20 members have attempted to get an EIC? 21 A. No. I don't know. I have no knowledge. 22 Q. Do you know if any constituents of your 23 members have attempted to get an EIC? 24 A. I presume it's likely, though it's -- EICs are 25 very rare, apparently, but I don't know.
1 A. The only person I knew who ever had one was 2 Jose Aliseda, and he kept it with him. He showed it to 3 me once in a deposition, and it was -- he talked about 4 how hard it was to get it and what it took for his 5 family to get it and for his brother to get it. 6 So the answer to your question is no, but 7 I know that that's a small number, and I can't imagine 8 showing that at the polls, how hard it was for him to 9 get that. 10 Q. Is MALC able to identify any constituents of 11 its members who do not have an EIC? 12 A. I think there have been 12 EICs issued, or 13 something like that. Some small number of EICs. And I 14 don't know the names of the people who have been issued 15 EICs, but I think we're talking dozens of EICs at this 16 point have been issued. 17 Q. To constituents of MALC members? 18 A. No. It's the people in Texas generally. And 19 I could be wrong with that number, but I remember at 20 some point it had been like only a few dozen had been 21 issued in 20 -- last year. Anyways, I don't have that 22 information, but it's a low number of folks who qualify 23 for that. 24 Q. Is MALC able to identify any of its members 25 who do not have any of the documents necessary to get an	131 133 1 Q. So MALC filed its complaint on September 17th, 2 2013. Can you identify any constituent of a MALC member 3 who at that time had been unable to vote on account of 4 his or her inability to obtain an acceptable form of ID 5 under SB 14? 6 A. Just the affected parties that Mr. Garza 7 represents. Those are the ones I'm aware of. I know 8 that there's been several provisional ballots cast 9 throughout the counties, but I do not know their VUIDs, 10 I don't know their names. But the affected people who 11 Mr. Garza represents, I think that's a good source of 12 that information. 13 Q. But right now as we sit here, is MALC able to 14 identify any constituent of a MALC member who on 15 September 17th, 2013, the date that MALC filed its 16 complaint in this case, had been unable to vote on 17 account of his or her inability to obtain an acceptable 18 form of ID under SB 14? 19 A. Again, I think the affected people are 20 certainly represented by MALC folks. And to the extent 21 they couldn't vote on that day, then that's my answer. 22 Q. So you're unable to identify any one of them? 23 A. I can't identify them by name, but I can give 24 you the category of folks that's known to you because 25 their intervenors. I don't know their names. I'm

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1 sorry. But I do know that there are affected people,  
2 and those people are likely represented by MALC members.

3 Q. Okay.

4 A. That's the best information I have for you.

5 Q. To be clear, I'm not asking for a category of  
6 people. I'm asking for identities.

7 A. Well, you know, I guess I could take a break  
8 and Google the intervention papers and get the names for  
9 you. I could do that.

10 Q. But as we sit here right now, you're unable to  
11 identify one?

12 A. Sure. I did identify the people. I mean,  
13 it's not a category of people. I misspoke. These are  
14 actual people that have been affected. They certainly  
15 are represented by MALC members and they're in this

16 litigation, so...

17 Q. Is MALC able to identify any Texas registered  
18 voter who on September 17th, 2013, had been unable to  
19 vote on account of his or her inability to obtain an  
20 acceptable form of ID under SB 14?

21 A. I believe those folks are registered, if I'm  
22 not mistaken.

23 Q. The ones you just previously mentioned?

24 A. Yes, sir.

25 Q. Is MALC able to identify a specific instance

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1 because there's not a DPS office close to you, and you  
2 can't get a car to go there, and you can't get money to  
3 get a birth certificate because you were born by a  
4 midwife, I think it's certainly possible that thousands  
5 of Texans are left out, that it's impossible to get an  
6 ID.

7 Q. Is MALC able to identify any constituents of  
8 its members who have not been able to vote in an  
9 election because of SB 14?

10 A. You know, I don't think so. I don't  
11 think the -- I'm not sure that the people who -- the  
12 affected parties who are intervenors who are represented  
13 by MALC people have actually tried yet to vote. I could  
14 be wrong. Whatever is in their intervention papers, I  
15 would stipulate to, so...

16 Q. You would defer to the intervention papers?

17 A. I would. I would. I mean, I don't know them  
18 personally, you know, although I think it takes  
19 incredible courage to do what they did, so...

20 Q. When you say, "courage to do what they did,"  
21 what are you referring to?

22 A. It takes a lot of courage to fight the State  
23 of Texas. It's easier for MALC because we have MALC  
24 members, and we have access to a budget to some degree.

25 And we do have -- on a session basis, it's our job to

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1 in which a constituent of a MALC member attempted to  
2 obtain an acceptable form of ID under SB 14 but was  
3 unable to?

1 fight for policies. Right?

2 But to put your name out there and say,  
3 "This law affects me," when people don't understand  
4 that -- the position of the voter -- you know, lots of  
5 people don't understand why you can't get ID. I mean,  
6 I've had ID problems all my life, so I'm sympathetic, I  
7 guess. I think it takes a lot of gumption to say, "This  
8 law is wrong," so...

9 Q. You said you've had ID problems in your life?

10 A. Sure.

11 Q. Can you elaborate on that?

12 A. When I first moved here, I had a suspended  
13 driver's license from Indiana because I failed to pay a  
14 speeding ticket that I got outside Muncie. And I didn't  
15 need a driver's -- I wasn't driving. I didn't have a  
16 car, and I didn't have a job, really. When I did get a  
17 job, I had somebody take me there, ferry me around. So  
18 I never really got a driver's license. And I didn't get  
19 a Texas driver's license until I think the year 2000,  
20 after I had moved here in the fall of '98. So, like,  
21 for two years I didn't have a Texas driver's license.  
22 And it may have even been after 2000, because I don't  
23 think I had a driver's license until after 9/11. I had  
24 a state-issued ID because I needed to get one because I  
25 needed to travel for debate. I was on the college

1 debate team. 2 Anyways, I know what it's like to have to 3 try to prove you are who you think you are. And it was 4 hard for me to get a birth certificate because I lost my 5 original -- we had lots of meanderings, my mom and I, 6 throughout the whole nation. Anyways, it was more 7 difficult than I had imagined. 8 Q. Have you ever been unable to vote when you 9 wanted to? 10 A. No, sir. 11 Q. Are you currently registered to vote? 12 A. Yes, sir. 13 Q. Do you know if any constituents of MALC 14 members chose not to vote in an election because of 15 SB 14? 16 A. I think it's likely that they didn't. I don't 17 know their names, but I know there's kind of categories 18 of apathies, what I would call it. There's lots of 19 people who don't vote because they don't believe that it 20 matters. I think that's probably the largest source. 21 And matters could be like, "I don't think it matters 22 because the government doesn't respond to my needs. I 23 don't think it matters because I don't think my vote 24 counts. I don't think it matters because it's 25 irrational to vote." My Libertarian friends tell me how	138 1 like a real crime. And there was some enforcement of 2 that new provision and law in Nueces County. And the 3 people who were affected by that and the families of 4 those people decided not to vote because of that 5 enforcement, but also they mentioned voter ID. 6 And this is a story I heard from 7 Representative Herrero. I think it's in his deposition 8 he talked about it for the redistricting matter. You 9 can refer to that. Anyways, the point is is that I 10 think those people decided not to vote in large measure 11 because of voter ID and because of the enforcement of 12 these laws, so... 13 Q. Are you familiar with the provisional ballot 14 process established by SB 14? 15 A. A little it. 16 Q. Can you tell me a little bit about it? 17 A. If you cast a provisional on election day, you 18 have six days to go back to the ballot poll to prove it 19 up. I think there's a couple different affidavits you 20 can sign. You could just either give them the ID that 21 you should have had on election day, or you can sign an 22 affidavit saying that you have a religious objection to 23 having your photograph taken. And I'm not sure if 24 disability works there yet. I think there's a carve out 25 for 100 percent disabled folks, I think. That's my
1 irrational voting is all the time. 2 So I think it's likely that people think 3 that voter ID was passed with such a discriminatory 4 intent and that it affected their belief of civil 5 society, that it rendered what they believed to be true 6 about Texas wrong. Right? I think that it cheapened 7 what it meant to be a voter. And so those people who 8 believed that to be true, it probably affected their 9 vote. I can't measure that. I don't have a polling 10 instrument that says that. Even if I did, I don't think 11 it's -- it's probably not measurable. But I know it to 12 be true that people lose faith in voting just like they 13 lose faith in other things, and this law didn't help 14 that. 15 Q. Can you identify -- or do you know if any 16 constituents of MALC members chose not to vote in an 17 election because of the requirements of SB 14? 18 A. I think it's likely. Again, I don't know 19 specific names. After 2011, there were lots of election 20 law changes. One of them was a registration change. 21 You couldn't register -- there's certain parameters. 22 You had to be from Texas to register people. You 23 couldn't be deputized to register unless you took a 24 class. If you were deputized to register people, you 25 could only do it under certain parameters. Also, it was	139 141 1 understanding of it generally. 2 Q. Does MALC take issue with the six day 3 requirement to cure a provisional ballot? 4 A. I don't think so. I think that that was 5 respondent to some of -- I don't know if -- respondent 6 is the wrong word. I think that that makes it slightly 7 more acceptable because there's a cure period. But the 8 truth of the matter is most provisional ballots are 9 never counted, and that's problematic to all MALC 10 members, regardless of party or where they live, where 11 they're from. 12 Q. On that note, has MALC either on its own or 13 through counsel submitted public record requests to 14 various counties seeking information regarding 15 provisional ballots cast during the most recent 16 selection cycle? 17 A. Not through its counsel. I certainly looked 18 at provisional ballots as part of my election law 19 practice, but not for MALC. It was for proposed 20 election contests that didn't come through, so... 21 (Exhibit No. 7 marked) 22 Q. (By Mr. Tatum) Okay. I'm handing you what's 23 been marked as Exhibit 7. 24 Mr. Golando, have you seen this document 25 or a document like it before?

<p>1 A. No, I haven't. I'm sorry.</p> <p>2 Q. Okay. Can you describe to me what this</p> <p>3 document is from looking at it?</p> <p>4 MS. RUDD: Objection; calls for</p> <p>5 speculation.</p> <p>6 A. It's a document dated December 5th, 2013.</p> <p>7 It's a public information -- it's an open records</p> <p>8 request for provisional ballots that were cast, and some</p> <p>9 other categories.</p> <p>10 Q. (By Mr. Tatum) I'll represent to you that</p> <p>11 this document has been produced to the defendants in</p> <p>12 this litigation, and there were a number of documents</p> <p>13 just like this produced to us, documents that were</p> <p>14 addressed -- this one is addressed to El Paso County.</p> <p>15 There were many others addressed to various other</p> <p>16 counties.</p> <p>17 In your work at MALC, are you familiar</p> <p>18 with these public records requests, or do you recall</p> <p>19 MALC asking for counsel to submit these on its behalf?</p> <p>20 MS. RUDD: And objection to the extent</p> <p>21 that that would require you to reveal any communications</p> <p>22 in the pursuit of legal advice between MALC and any of</p> <p>23 the attorneys for MALC in this litigation.</p> <p>24 A. No.</p> <p>25 Q. (By Mr. Tatum) Have you seen any of the</p>	<p>142</p> <p>1 THE WITNESS: Okay.</p> <p>2 MS. RUDD: If you don't know, don't</p> <p>3 speculate.</p> <p>4 A. I don't know.</p> <p>5 Q. (By Mr. Tatum) Let me ask you: What is this</p> <p>6 document? What does it look like?</p> <p>7 MS. RUDD: Objection; calls for</p> <p>8 speculation.</p> <p>9 A. I don't know. Possibly a list of voters,</p> <p>10 possibly.</p> <p>11 Q. (By Mr. Tatum) Okay. But you've never seen</p> <p>12 this document before?</p> <p>13 A. You know, I don't think that I have. At least</p> <p>14 I don't remember seeing it. I apologize.</p> <p>15 Q. I'm not going to ask you any more questions</p> <p>16 about that document, so you can -- unless you want to</p> <p>17 keep looking at it.</p> <p>18 A. No, I -- I may, actually.</p> <p>19 Q. Okay.</p> <p>20 A. But go ahead. I'm listening.</p> <p>21 Q. Okay. Does MALC contend that SB 14 amounts to</p> <p>22 a poll tax?</p> <p>23 A. Yes, in part.</p> <p>24 Q. And why is that?</p> <p>25 A. Because it takes ID to get ID, and some people</p>
<p>143</p> <p>1 responses from the counties to a request like this?</p> <p>2 A. No.</p> <p>3 Q. So you don't know how many public records</p> <p>4 requests like this were submitted on behalf of MALC?</p> <p>5 A. No.</p> <p>6 Q. Okay.</p> <p>7 (Exhibit No. 8 marked)</p> <p>8 Q. (By Mr. Tatum) I'm now handing you what's</p> <p>9 been marked as Exhibit 8. If you wouldn't mind just</p> <p>10 pressing down on that sticker. I don't think I got it</p> <p>11 on there all the way. Thanks.</p> <p>12 MS. RUDD: All right.</p> <p>13 Q. (By Mr. Tatum) I'll represent to you that</p> <p>14 this has been produced to the defendants in this</p> <p>15 litigation, and it was produced in native format, so I</p> <p>16 wasn't able to print it with a Bates number on it, but I</p> <p>17 represent to you for future reference that the Bates</p> <p>18 number for this document is MALC 00003780.</p> <p>19 Do you recognize this document?</p> <p>20 A. We turned over lots of documents. I don't</p> <p>21 recognize this one, unfortunately.</p> <p>22 Q. So you don't know what the names on this</p> <p>23 document represent?</p> <p>24 A. Well, I guess I could infer.</p> <p>25 MS. RUDD: Don't infer.</p>	<p>145</p> <p>1 without ID have to buy ID to get it. And as a</p> <p>2 consequence of that, it's, I guess, a literal poll tax.</p> <p>3 Q. Is MALC aware that an EIC is an acceptable</p> <p>4 form of ID to vote under SB 14?</p> <p>5 A. It is.</p> <p>6 Q. Is MALC aware that an EIC is obtainable free</p> <p>7 of charge?</p> <p>8 A. But if you don't have the foundational</p> <p>9 documents to get an EIC, it's the same problem. Right?</p> <p>10 And an EIC also takes time to get. Right? You have to</p> <p>11 go to DPS to do it. You have to sign like three</p> <p>12 different waivers that says, "I'm not going to use this</p> <p>13 for ID purposes. I need this for voting." I mean, it's</p> <p>14 a strange ID in that request. Have you ever had to sign</p> <p>15 something like that to get an ID? It's very strange.</p> <p>16 Anyways, my point is that you got to have</p> <p>17 an ID to get an ID, and that includes the EIC, so...</p> <p>18 Q. But MALC is aware that the actual EIC is</p> <p>19 issued free of charge?</p> <p>20 A. And I know why it's free of charge, and I know</p> <p>21 how it came about, because my boss brought a point of</p> <p>22 order on the bill considering the Texas Mobility Fund as</p> <p>23 we discussed earlier, that was rejected. But it turned</p> <p>24 out that you couldn't rob the Texas Mobility Fund of</p> <p>25 these license fees, because they would put the full</p>

<p>1 faith and credit of Texas on the line. You couldn't do 2 that constitutionally. 3 And so they went into conference and they 4 decided to create a whole new ID that was outside of the 5 Texas Mobility Fund in order to solve this 6 constitutional problem. And in order to do that, they 7 had to go outside the bounds because it's outside the 8 scope of the House rules to do this. So, yes, I'm aware 9 of the EIC. 10 Q. Are you aware that the EIC is issued free of 11 charge? 12 A. Yes, sir. 13 Q. Okay. I want to ask you a couple more 14 questions regarding -- and I'm going back to our 15 discussion about legislative activities or procedures 16 that the Legislature used during the enactment of SB 14, 17 if I may. Specifically I want to talk about the 18 practice that you called chubbing and the chubathon -- 19 is that what it was called? 20 A. Probably. That's what I call it. 21 Q. Okay. I think I remember you calling it a 22 chubathon back in 2009. And without going back in the 23 transcript, would you mind explaining again what 24 chubbing -- the practice of chubbing entails? 25 A. Generally chubbing is the elongation of debate</p>	<p>146</p> <p>1 Q. So when you say forced the calendar out, does 2 that mean they forced all those bills that were south of 3 SB 362 on the calendar out? 4 A. So there was a legislative deadline to get 5 Senate bills out, so the final consideration of Senate 6 bills. I think it was -- it's usually the middle of 7 May, May 17th or May 20th, something like that. And the 8 last day had on the local calendar was the day before, 9 something like that -- or a couple days before. So over 10 the weekend, all -- the local calendar never finished in 11 time to consider these bills. And then the last day, I 12 think it was a Sunday if I recall correctly, there 13 was -- there were all these calendars that had kind of 14 jammed up, and so there was about -- I think there was 15 about 110 substantive bills between the bill that was 16 first up and 362. I think that's right. 17 Anyways, lots of bills to add that day 18 because of the tactic. It was unfortunate. 19 Q. So lots of bills died that day because of the 20 tactic employed by MALC in that instance? 21 A. Many MALC members. I mean, MALC is -- 22 Q. Sorry. 23 A. Yeah. 24 Q. Were any of those bills that died because of 25 the chubbing tactic employed by MALC members, were those</p>
<p>1 on a bill in order to prevent the consideration of bills 2 south of it on the calendar. 3 In this case, it was a systematic effort, 4 that was a caucus-wide effort, to elongate the local 5 calendars for days to essentially force consideration of 6 House bills -- certain House bills on the calendar off. 7 Usually the local calendar is handled within one day, 8 and four to five hours at a time. Right? So a local 9 calendar usually has about 200 bills on it, and you read 10 through them real quickly, and then you pass them a 11 third time. So the second and third reading are on top 12 of each other, and in between you have a legislative 13 day. It's kind of hyper technical. But usually it 14 takes about two to three hours. 15 This time we forced -- we -- the members 16 forced the authors of the bill to explain their bill for 17 a full ten minutes, and then there was ten minutes of 18 questioning on each bill. So what usually would have 19 taken four hours, took I think five or six days, 20 essentially forcing the legislative calendar out. 21 Q. And when you say "forcing the legislative 22 calendar out," does that mean forcing the bills that 23 were south of -- I believe in this instance it was 24 SB 362? 25 A. Yes, I think that's correct. Yes, sir.</p>	<p>147</p> <p>1 bills authored by MALC members? 2 A. I think some of them were. I'm sure that 3 my -- I'm trying to remember if my boss had one on the 4 calendar in 2009. I think we did. We usually get 5 considered pretty late in the session. If we're lucky 6 to get calendar, it's a pretty late calendar. I'm 7 trying to think what we had there. It's probably one of 8 our VIA bills, I think. I forget. I think we had one 9 on the calendar. 10 Q. One of your what bills? 11 A. VIA bills. San Antonio VIA is the bus place 12 for San Antonio. I could be wrong about the actual 13 bill, but I think we had a bill on the calendar, and I 14 think it died because of it, which is how it goes. 15 Q. Was the chubbing tactic employed on that day 16 during the, quote, unquote, chubathon, was that agreed 17 to by all the members of MALC? 18 A. I don't know. I think it was probably agreed 19 to by most members. Because all that would have to have 20 happened in the chubathon for the record is to have five 21 members talk off every bill. 22 In the local calendar, you can either 23 talk off a bill by speaking for more than ten minutes, 24 or if you have four friends who can go to a bill and 25 say, "We want to talk off each of these bills," that's</p>

<p>1 the way to do it.</p> <p>2 And no one did that. Republicans or</p> <p>3 Democrats did that. Every one of them could have ended</p> <p>4 the chubathon right there and then if they had just</p> <p>5 signed a card -- had four members or five members sign a</p> <p>6 card against all the bills being considered, and then we</p> <p>7 would have had to have gone on with the daily calendar</p> <p>8 business. Right?</p> <p>9 That didn't happen. So I assume that the</p> <p>10 MALC members who could have done that didn't do that. I</p> <p>11 think the inference is quite clear that they supported</p> <p>12 the chubathon, so --</p> <p>13 Q. You testified that you're sure that some of</p> <p>14 the bills that died that day were bills authored by</p> <p>15 members of MALC. Correct?</p> <p>16 A. It's certainly likely; although, I don't have</p> <p>17 an exhaustive knowledge of bills that died on the</p> <p>18 calendar. I think we had one, I think, but again, it's</p> <p>19 been -- since 2009, it's been a very long time for me.</p> <p>20 Q. When you say "we," do you mean --</p> <p>21 A. Me and Trey. I'm sorry.</p> <p>22 Q. So is it safe to say that members of MALC were</p> <p>23 willing to kill their own bills that may or may not have</p> <p>24 been supported by their own constituents in order to</p> <p>25 defeat a voter ID bill through the use of chubbing?</p>	<p>150</p> <p>1 But I think that -- like I said before --</p> <p>2 and I don't think I can add more than this -- is that</p> <p>3 MALC members and the members who employed this tactic</p> <p>4 were certain that this bill was wrong --</p> <p>5 constitutionally wrong. It was immoral, probably</p> <p>6 racist, and they didn't want to ratify that.</p> <p>7 Q. (By Mr. Tatum) On what basis does -- let me</p> <p>8 retract that.</p> <p>9 At that point of the chubathon, had</p> <p>10 members of MALC employed the chubbing tactic before?</p> <p>11 A. Sure. Not to kill a specific bill. I think</p> <p>12 that toward the end of session -- not in that way. I</p> <p>13 don't think chubbing the local calendar had ever been</p> <p>14 done. So that was something completely new. It was a</p> <p>15 new tactic for a specific calendar. Right?</p> <p>16 At the end of the session, there's always</p> <p>17 those deadlines. Deadlines to get a House bill out, a</p> <p>18 deadline to consider a conference committee report, a</p> <p>19 deadline to get a Senate bill passed by the House. And</p> <p>20 at the end of those deadlines, usually sometime between</p> <p>21 10:30 p.m. to midnight, there is kind of elongated</p> <p>22 consideration by people because they want to kind of hit</p> <p>23 the brakes on passage of bills. It happens every</p> <p>24 session, bills start hitting the brakes.</p> <p>25 And then there's a mad dash toward the</p>
<p>1 MS. RUDD: Objection; calls for</p> <p>2 speculation, mischaracterizes testimony.</p> <p>3 A. Fair? I don't know. I think legislative</p> <p>4 intent is fairly complex, as we've discussed.</p> <p>5 I think that what's fair to say is that</p> <p>6 MALC members thought the bill was so horrible and</p> <p>7 deleterious to its people, that they would do this</p> <p>8 extraordinary action to prevent its passage. I think</p> <p>9 that's the fairest thing I could say.</p> <p>10 Q. (By Mr. Tatum) Even at the sacrifice of their</p> <p>11 own bills?</p> <p>12 A. Yeah, I think that's the implication about the</p> <p>13 tactic. That's how horrible they thought this bill was.</p> <p>14 I think they were right.</p> <p>15 Q. So it was worth more to kill that bill than to</p> <p>16 pass bills that they, themselves, had authored?</p> <p>17 MS. RUDD: Objection; calls for</p> <p>18 speculation, argumentative.</p> <p>19 A. Again, legislative intent is very complex. If</p> <p>20 I recall correctly, the Senate version of that bill</p> <p>21 required you to have both your Texas registration card</p> <p>22 and your driver's license or else you had to cast a</p> <p>23 provisional. That's how bad that bill was, I think.</p> <p>24 And I could be mistaken. Again, it's been many</p> <p>25 different versions of the same bill.</p>	<p>151</p> <p>153</p> <p>1 end. When there's, like, ten minutes left, they start</p> <p>2 going through bills that are -- you know, at a rapid</p> <p>3 pace. Anyways, it's a strange phenomenon, but it</p> <p>4 happens every time.</p> <p>5 Q. So chubbing -- and if there's a better term</p> <p>6 for it than "chubbing," please let me know.</p> <p>7 A. I wish -- I guess there's --</p> <p>8 Q. Okay.</p> <p>9 A. I don't know. I don't know.</p> <p>10 Q. We'll just call it chubbing.</p> <p>11 A. Yeah.</p> <p>12 Q. So you testified that the tactic of chubbing</p> <p>13 had never been used before the chubathon to that degree.</p> <p>14 Is that correct?</p> <p>15 A. On the local calendar. I want to be very</p> <p>16 clear. There are five or six different calendars that</p> <p>17 exist in the House rules. The local and consent</p> <p>18 calendar is one of those calendars. It has special</p> <p>19 rules associated with it. It has a special calendar</p> <p>20 committee that nominates bills for this calendar.</p> <p>21 And I don't think -- again, my -- I know</p> <p>22 a lot about this, but not -- I don't have, you know,</p> <p>23 exhaustive knowledge of it, or complete knowledge. I</p> <p>24 don't think the chubbing had ever been done on the local</p> <p>25 before, and certainly not to this degree where it was</p>

<p>1 days of consideration on the local calendar.</p> <p>2 Q. So would you say that it -- in executing the</p> <p>3 chubathon, that MALC employed a tactic in a way that</p> <p>4 diverted from normal legislative procedures?</p> <p>5 MS. RUDD: Objection; mischaracterizes</p> <p>6 the testimony.</p> <p>7 A. I don't think so. I think that it was a</p> <p>8 unique tactical choice. It was certainly -- I think</p> <p>9 everything that's unique is somewhat a deviation from</p> <p>10 normalcy. So in that sense, partially. But chubbing</p> <p>11 itself had existed a long time before that for the</p> <p>12 record. Right? It just hadn't been used to this degree</p> <p>13 and on this calendar, so...</p> <p>14 Q. (By Mr. Tatum) Has MALC or members of MALC</p> <p>15 employed the tactic of chubbing since the chubathon?</p> <p>16 A. I think so. I think chubbing -- again,</p> <p>17 generally we're talking about. Right? In 2013, there</p> <p>18 was -- towards the end of the debate on when you could</p> <p>19 get House bills out, I think there was some slowing down</p> <p>20 generally. That's what generally happens. It may have</p> <p>21 been by MALC members or not. I can't recall exactly.</p> <p>22 But chubbing exists for a reason.</p> <p>23 Sometimes you just want to hit the brakes</p> <p>24 because you're tired. Sometimes you want to hit the</p> <p>25 brakes because you want to hit the brakes to prevent a</p>	<p>154</p> <p>1 either non-substantive changes or for the budget to</p> <p>2 adjust a category. We want to give 5 million to a</p> <p>3 budget category, not 4 million. Right?</p> <p>4 And there's a small category for</p> <p>5 substantive changes, but this was an entirely new</p> <p>6 provision in the bill, a creation of a whole new ID done</p> <p>7 by an outside the bounds resolution in a conference</p> <p>8 committee.</p> <p>9 So something horribly substantive that,</p> <p>10 you know, was responsive to both my bosses and other</p> <p>11 MALC member concerns was decided outside of their</p> <p>12 ability to influence that dialogue by the members of the</p> <p>13 conference committee. And they were -- and you don't</p> <p>14 get a lot of notice on an outside the bounds resolution.</p> <p>15 You wake up in the morning, and there's a resolution on</p> <p>16 your table saying, "You have to agree to this," and you</p> <p>17 can't amend it. Right?</p> <p>18 So it's one of those things where a</p> <p>19 legitimate concern was taken, and then a smaller group</p> <p>20 of legislators made a decision, and there was little</p> <p>21 notice and little ability to change the outcome, so...</p> <p>22 Q. Is MALC able to identify a constituent of a</p> <p>23 MALC member who has suffered harm at any point because</p> <p>24 of SB 14?</p> <p>25 A. And this may be where I differ from my</p>
<p>1 bill from passing.</p> <p>2 I can't recall the specific bill -- or a</p> <p>3 specific bill from this session that may have been a</p> <p>4 victim of chubbing. And sometimes it's just kind of the</p> <p>5 nature of the calendar itself. There's just not enough</p> <p>6 time to consider all the bills on the calendar.</p> <p>7 Q. In your legislative experience, have you found</p> <p>8 that chubbing exists more or less often than an outside</p> <p>9 the bounds resolution?</p> <p>10 A. Outside the bounds resolutions are common for</p> <p>11 the appropriations bill. That happens all the time for</p> <p>12 appropriations. And then for non-appropriations bills</p> <p>13 or non-budget related bills, outside the bounds</p> <p>14 resolutions occur at a much slower rate. And you can</p> <p>15 check by work, because it requires a House resolution to</p> <p>16 do it, and it's just -- I think it requires an HCR or an</p> <p>17 SCR, depending on what the origin of the bill is. And I</p> <p>18 think that those are rarer than you might imagine, maybe</p> <p>19 20 or 30 -- fewer than that, probably -- per session.</p> <p>20 And chubbing is probably a one-day event or a one-hour</p> <p>21 event, so I'm not sure how you would magnify -- or how</p> <p>22 you would make that determination.</p> <p>23 Why I say that the voter ID bill was out</p> <p>24 of bounds and why that's a deviation from normal</p> <p>25 procedure is that most out of bounds resolutions are for</p>	<p>155</p> <p>157</p> <p>1 attorney in the sense that on our discussion of harm --</p> <p>2 because I believe that every one of our constituents</p> <p>3 have been harmed by the bill. And I don't mean this --</p> <p>4 I really don't mean this esoterically. It sounds like</p> <p>5 I'm just preaching platitudes. I'm really not trying to</p> <p>6 do that.</p> <p>7 I think every person in Texas is harmed</p> <p>8 by the bill. When Texas passes laws that are focused on</p> <p>9 what I believe is a disfranchising intent that have a --</p> <p>10 that were passed with an impermissible purpose, that</p> <p>11 cheapens what it means to be a Texan. And I'm saying</p> <p>12 this as someone who is an adopted Texan. I'm not even</p> <p>13 from here, really. But this is a great state, and it is</p> <p>14 made a worse place because of bills like this, in my</p> <p>15 opinion.</p> <p>16 And so the honest answer to your question</p> <p>17 is that I think everyone has been harmed by it; everyone</p> <p>18 in this room, everyone in this state.</p> <p>19 Q. Can you elaborate on what you mean by</p> <p>20 "impermissible purpose"?</p> <p>21 A. I think that -- impermissible generally means</p> <p>22 an unlawful purpose. In this instance, I mean a racist</p> <p>23 purpose. I think that this bill is -- it seeks to</p> <p>24 abridge the voting rights of minorities on account of</p> <p>25 their race. That's what I mean.</p>

<p>1            And I think that it also unequally 2 enforces the laws. I think that there are several 3 provisions like that in this bill that do that. So I 4 think that those are two impermissible motives on behalf 5 of policy and decision makers that enacted this bill.</p> <p>6    Q. Does MALC believe that anyone who supports 7 SB 14 is a racist?</p> <p>8    A. No, unless they're a racist and they support 9 it. I mean, I'm certain that racists do support it, to 10 be clear. I'm certain that there are prejudiced and 11 bigoted people who do support it, but I don't think it 12 makes you a racist just to support it.</p> <p>13    Q. What makes you certain that racists do support 14 SB 14?</p> <p>15    MS. RUDD: Objection; mischaracterizes 16 testimony.</p> <p>17    A. I'm not sure if this has been produced or not, 18 but there's been some -- I've gotten some emails from 19 people who support the bill and who have taken what I 20 think to be a racist tone with me. And maybe it was 21 some emails that predate the litigation. I have some 22 knowledge or some -- I have some memory of 23 correspondence with people who I think used racist terms 24 in their emails with me.</p> <p>25    I've had conversations with people who I</p>	<p>158</p> <p>1 immigration is an infectious disease." That's racist to 2 me.</p> <p>3            And while he's a very nice man to me and 4 we have very deep conversations about this issue, I have 5 to tell you that I think that's a racist purpose -- or 6 that's a racist rhetoric. And when -- it's not 7 surprising to me that he supports this bill, so...</p> <p>8    Q. Have you ever personally encountered rhetoric 9 like that from a legislator who supported SB 14?</p> <p>10    A. Personally, no. But during the 2007 session, 11 I think Betty Brown pulled Ramey Ko -- and this is well 12 known; I'm sure you know it -- Ramey Ko aside and said, 13 "You guys should consider changing your names," meaning 14 Asian-Americans, "so people can understand you better."</p> <p>15            And I think it's a well-intentioned thing 16 to say. I don't know Betty Brown very well. She and my 17 boss had a falling out about something personal, and I 18 couldn't say that I thought very highly of her. But 19 when she said that, that took me aback that someone 20 would say that, that someone should change their name.</p> <p>21            And it actually dovetails with the 22 Italian-American experience. I'm Italian-American. My 23 family came over here on a boat, and I think that we 24 were the Anglos' first Latinos, and my name was changed 25 when I got here. Anyway, my point is, is that the</p>
<p>1    thought -- that I thought were racist conversations who 2 told me they would support the bill. But I think you're 3 asking me for something deeper than that, whether I 4 think that racists support the bill.</p> <p>5    Q. (By Mr. Tatum) Well, let me stick to what you 6 just testified to.</p> <p>7    A. Sure.</p> <p>8    Q. You mentioned conversations with people who 9 you thought were racist who told you they support the 10 bill.</p> <p>11    A. Yes.</p> <p>12    Q. I'm reading that from the transcript here. Do 13 you recall who those people were?</p> <p>14    A. There's a -- well, I can't recall his name. 15 I'm sorry. There's a constituent who calls Trey's 16 office when I was working there fairly frequently, about 17 once a quarter, and we have very long conversations 18 about ethnicity and identity. And he's very much 19 against hyphenation Americans, is what he calls them -- 20 so Mexican-Americans, Italian-Americans -- and I always 21 try to defend multiculturalism.</p> <p>22            He's never said a racist epithet to me, 23 but it's been my experience that people who espouse the 24 kind of rhetoric that he espouses probably have a racist 25 belief. And he uses words like "takers" or "Latino</p>	<p>159</p> <p>161</p> <p>1 rhetoric used during that time period was rough. And 2 during 2011, it was -- the rhetoric was pretty bad, too.</p> <p>3            And it wasn't just from House members. 4 There were -- Rebecca Forest, I think, has a group 5 called Women Against the Wall, or something like that, 6 and they had a meeting at the Capitol -- on the Capitol 7 during the session, and she said the reason we can't 8 pass immigration reform is because there were too many 9 Latino legislators. And I don't know what that means, 10 but it certainly sounds racial to me.</p> <p>11            Anyway, to the degree that -- I know you 12 can't have a group on the Capitol stage without someone 13 greasing the skids for you with House administration, so 14 some member helped that person out. And I don't know if 15 they support that person or not, but I've got to tell 16 you that that's change to me, that that happened.</p> <p>17            And there were other things, too. I 18 mean, the registering bill, I think, was a racist bill. 19 There were immigration bills that were considered that I 20 thought were racist in nature. So it was kind of a part 21 and parcel throughout the whole session, kind of a hyper 22 racially charged session in 2011, so...</p> <p>23    Q. So in your opinion, SB 14 was not the only 24 bill passed during 2011 that may have had racial or 25 discriminatory intent?</p>

<p>1 A. Sadly, no. I think that, obviously, the 2011 2 registering plan is a hyper discriminatory bill and was 3 intended to be discriminatory.</p> <p>4 Q. Mr. Golando, do you know if MALC has produced 5 any and all documents responsive to the various requests 6 for production that defendants have submitted?</p> <p>7 A. To my knowledge. If I find more, I will 8 certainly make a more fulsome -- and it's certainly not 9 my intent to withhold anything. We have nothing to 10 hide. I think we've been particularly above board. 11 I've given you everything that's in MALC's control, 12 that's for sure.</p> <p>13 There may be -- I know that there have 14 been a lot of third-party subpoenas issued, which I, 15 frankly, disagree with tactically, but -- in fact, we 16 received one and will be complying with that as soon as 17 I get all my documents in a row, so...</p> <p>18 Q. Why do you disagree with those subpoenas 19 tactically?</p> <p>20 A. I think --</p> <p>21 MS. RUDD: Okay. Wait. I don't know if 22 you're disagreeing with them as an attorney for MALC. I 23 just don't want you to reveal any of your mental 24 impressions as an attorney.</p> <p>25 THE WITNESS: Fair enough.</p>	<p>162</p> <p>1 your answers, or is there anything you'd like to add 2 with regard to any of the answers you've given here 3 today?</p> <p>4 A. I meant to look up the name of the Florida 5 State Representative who is friends with my boss and 6 Representative Anchia.</p> <p>7 Q. Oh, that's right.</p> <p>8 A. I meant to do that. I think it's Juan Zapata, 9 I think, but I'll have to -- I'm not certain. He's a 10 nice guy.</p> <p>11 Q. You think that that might be the Florida 12 legislator --</p> <p>13 A. Correct, who is friends with Representative 14 Anchia and my boss. And I'm not -- again, I am not 15 clear if they've ever discussed -- I imagine that they 16 haven't, but you asked me about inter-caucus 17 communications, so...</p> <p>18 Q. Right.</p> <p>19 A. I think that everything else will have to wait 20 until I review the transcript.</p> <p>21 MR. TATUM: I pass the witness.</p> <p>22 MS. RUDD: We have no questions at this 23 time.</p> <p>24 Angela, do you have any questions for 25 Marty?</p>
<p>163</p> <p>1 A. This is not from my attorney -- this is from 2 my legislative background. It's uncommon for 3 legislators to get subpoenaed. And I can't imagine that 4 Jay Dyer would want you to use a third-party subpoena 5 company to subpoena legislators, and that when members 6 look at the name of the subpoena deliverer and it was 7 associated with debt collection, it was a surprise to my 8 members that they were getting subpoenaed, generally, 9 and they were subpoenaed in this way, and so -- that's 10 why I disagree with it.</p> <p>11 Q. (By Mr. Tatum) Okay. Mr. Golando, if MALC is 12 successful in this litigation, do you intend to seek 13 attorney's fees for your services?</p> <p>14 A. For mine?</p> <p>15 Q. Yes.</p> <p>16 A. Like I said before, my litigation part of this 17 has been minimal. It's been limited to just kind of 18 doing -- getting documents together. I routinely 19 collect my hours, just because I try to monitor my own 20 time, but I do not intend to seek fees in this 21 litigation. In this one.</p> <p>22 Q. Mr. Golando, I don't have any more questions 23 for you right now at this point.</p> <p>24 Before I pass the witness, is there 25 anything you'd like to clarify with regard to any of</p>	<p>165</p> <p>1 MS. MILLER: No questions from the United 2 States.</p> <p>3 MS. RUDD: All right.</p> <p>4 MR. TATUM: Okay.</p> <p>5 (Deposition concluded at 2:09 p.m.)</p> <p>6 (Signature requested.)</p> <p>7 * * * * *</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1 CHANGES AND SIGNATURE  
2 WITNESS NAME: MARTIN GOLANDO  
3 DATE OF DEPOSITION: JUNE 24, 2014

4 PAGE/LINE CHANGE REASON

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1 THE STATE OF TEXAS:  
2 COUNTY OF TRAVIS:

3 I, Steven Stogel, a Certified Shorthand Reporter in  
4 and for the State of Texas, do hereby certify that the  
5 facts as stated by me in the caption hereto are true;  
6 that the above and foregoing answers of the witness,  
7 MARTIN GOLANDO, to the interrogatories as indicated were  
8 made before me by the said witness after being first  
9 duly sworn to testify the truth, and same were reduced  
10 to typewriting under my direction; that the above and  
11 foregoing deposition as set forth in typewriting is a  
12 full, true, and correct transcript of the proceedings  
13 had at the time of taking of said deposition.

14 I further certify that I am not, in any capacity, a  
15 regular employee of the party in whose behalf this  
16 deposition is taken, nor in the regular employ of his  
17 attorney; and I certify that I am not interested in the  
18 cause, nor of kin or counsel to either of the parties.

19 filed with the Clerk.

20 GIVEN UNDER MY HAND AND SEAL OF OFFICE, on this,  
21 the \_\_\_\_\_ day of June, 2014.

22 Steven Stogel, CSR 6174  
23 Expiration Date: December 31, 2014  
24 Integrity Legal Support Solutions  
25 Firm Registration No. 528  
3100 W. Slaughter Lane, Suite A-101  
Austin, Texas 78748  
(512) 320-8690

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1 I, MARTIN GOLANDO, have read the foregoing  
2 deposition and hereby affix my signature that same is  
3 true and correct, except as noted above.

4 \_\_\_\_\_  
5 MARTIN GOLANDO  
6 \_\_\_\_\_  
7 THE STATE OF \_\_\_\_\_)  
8 COUNTY OF \_\_\_\_\_)  
9 \_\_\_\_\_  
10 Before me, \_\_\_\_\_, on this day  
11 personally appeared MARTIN GOLANDO, known to me (or  
12 proved to me under oath or through \_\_\_\_\_)  
13 (description of identity card or other document) to be  
14 the person whose name is subscribed to the foregoing  
15 instrument and acknowledged to me that they executed the  
16 same for the purposes and consideration therein  
17 expressed.

18 Given under my hand and seal of office this the  
19 \_\_\_\_\_ day of \_\_\_\_\_, 2014.

20 \_\_\_\_\_  
21 \_\_\_\_\_  
22 NOTARY PUBLIC IN AND FOR  
23 THE STATE OF \_\_\_\_\_  
24 \_\_\_\_\_  
25 \_\_\_\_\_

<p style="text-align: center;">\$</p> <hr/> <p><b>\$1,000</b> 79:12</p> <p><b>\$1,600</b> 79:12</p> <p><b>\$300</b> 35:6,7</p> <p><b>\$4,000</b> 86:9</p> <p><b>\$4,200</b> 86:7</p> <hr/> <p style="text-align: center;">0</p> <hr/> <p><b>00003780</b> 143:18</p> <p><b>07</b> 59:22 86:4</p> <p><b>09</b> 59:22,24</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p><b>1</b> 7:3 19:16,18 20:13,19,22 21:2,4 112:5</p> <p><b>1.8</b> 128:15,21,22</p> <p><b>1:19</b> 127:8</p> <p><b>10</b> 24:10,13,15 26:24 128:20</p> <p><b>10:00</b> 97:12</p> <p><b>10:30</b> 152:21</p> <p><b>10:41</b> 61:19</p> <p><b>10:49</b> 61:19</p> <p><b>100</b> 98:15 140:25</p> <p><b>1099</b> 16:17</p> <p><b>11</b> 24:17,20,22 59:24 91:15</p> <p><b>11:00</b> 12:17</p> <p><b>110</b> 148:15</p> <p><b>119</b> 7:7</p> <p><b>11th</b> 13:12</p> <p><b>12</b> 24:24 25:2,4 91:14 131:12</p> <p><b>12/5/13</b> 7:14</p> <p><b>12:00</b> 127:6</p> <p><b>12:13</b> 127:8</p> <p><b>120</b> 7:9</p>	<p><b>121</b> 7:10</p> <p><b>124</b> 7:12</p> <p><b>12548</b> 5:18</p> <p><b>13</b> 25:6,9,11,15,18 116:16 117:14</p> <p><b>13th</b> 36:16</p> <p><b>14</b> 20:21 22:13,15,25 25:7,20,22,24 26:1,5,17 27:3,14 28:1,23 29:1,2 53:22 54:9 55:20 56:1 59:18 61:12,13 62:9 63:6,14 64:7,11 68:9 69:11 70:16,18,25 71:8,24 72:2 75:2,5 80:4 81:2 84:10 86:25 87:12 88:5,9,20,24 89:16,25 91:3,7 96:1 98:8,18 99:3 100:7,18,20 101:21 102:13 103:23 104:11 105:5,20 106:6 107:11,20 108:4,5,7 110:17,22 114:19 116:7,12,25 117:6,20 119:9,12,23 123:16 127:10,17,23 128:6 129:5 133:5,18 134:20 135:2,16 136:9 138:15 139:17 140:14 144:21 145:4 146:16 156:24 158:7,14 160:9 161:23</p> <p><b>141</b> 7:13</p> <p><b>143</b> 7:15</p> <p><b>14-related</b> 72:14 79:19 80:19 81:19 83:7</p> <p><b>14th</b> 4:14</p> <p><b>15</b> 26:3,9,11</p> <p><b>150</b> 58:22</p> <p><b>16</b> 26:13,20,22</p>	<p><b>168</b> 6:7</p> <p><b>16th</b> 41:12</p> <p><b>17</b> 26:24 27:6,8</p> <p><b>17th</b> 21:15 26:14 27:12 82:14 133:1,15 134:18 148:7</p> <p><b>18</b> 27:10,18,20</p> <p><b>18,000</b> 130:7</p> <p><b>1860</b> 119:11</p> <p><b>19</b> 7:3 27:22 28:5,7</p> <p><b>1973</b> 31:20</p> <p><b>1977</b> 13:12</p> <p><b>1st</b> 16:1 17:19 18:3</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p><b>2</b> 7:4 20:23 21:6,10,12 61:20,22 65:15 67:25 69:21 70:6 78:21,25</p> <p><b>2:09</b> 4:11 165:5</p> <p><b>2:13-CV-193</b> 1:4</p> <p><b>2:13-CV-263</b> 2:2</p> <p><b>2:13-CV-291</b> 3:2</p> <p><b>2:13-CV-348</b> 3:12</p> <p><b>2:30</b> 11:19</p> <p><b>20</b> 28:9 104:16 128:20 131:21 155:19</p> <p><b>200</b> 147:9</p> <p><b>200,000</b> 128:22</p> <p><b>2000</b> 48:10 137:19,22</p> <p><b>2003</b> 13:19</p> <p><b>2004</b> 22:5 23:10 24:4,11,18,25 29:20 30:6,16 31:2 60:24,25</p> <p><b>2005</b> 26:7 57:24 59:20 60:25 91:11</p> <p><b>2007</b> 13:20 14:11 57:24 91:17 96:16</p>
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